
In the matter of: Clause 8 of Schedule 1 – Resource Management Act 1991
– Further submission on publicly notified plan change and
variation – Proposed Plan Change 1 and Variation 1 to
Waikato Regional Plan – Waikato and Waipa River
Catchments

And: **Wairakei Pastoral Ltd**

Further Submitter

And: **Waikato Regional Council**

Local Authority

**Further submission on publicly notified proposal for plan
change and variation**

Dated: **17 September 2018**

Counsel:

RJ Somerville QC / T Daya-Winterbottom

Solicitors:

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Form 6

**FURTHER SUBMISSION IN SUPPORT OF, OR IN
OPPOSITION TO, SUBMISSIONS ON NOTIFIED PROPOSAL
FOR PLAN CHANGE AND VARIATION**

Clause 8 of Schedule 1, Resource Management Act 1991

To: Waikato Regional Council (**local authority** or **WRC**)

Name of further submitter: **Wairakei Pastoral Ltd**

**Further Submission on Proposed Plan Change 1 and
Variation 1 to Waikato Regional Plan**

- 1 This is a further submission in support of, or in opposition to submissions on the following proposals:
 - 1.1 Proposed Waikato Regional Plan Change 1 (**PC1**); and
 - 1.2 Variation 1 to Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments (**Variation**).

Wairakei Pastoral

- 2 Wairakei Pastoral Ltd (**WPL**) made submissions on PC1 and Variation.
- 3 WPL could not gain an advantage in trade competition through this submission.
- 4 WPL is a wholly New Zealand owned company and is the freehold owner of the 25,690ha Wairakei Estate (**Estate**) north of Taupo shown edged black on the **attached** location map. The Estate is located partly in Sub-catchments 66, 72, 73 and 74 (see Map 3.11-2 as notified). It is committed to sustainable management, and has a long-term interest in and inter-generational vision for the management of the Estate. WPL is also a very environmentally aware and responsible corporate citizen.
- 5 The Estate's success is due to long-term values, mixed land use and valued partnerships with WPL's like-minded lessees. These include Landcorp Farming Ltd, Mercury Energy Ltd and Fiber Fresh Feeds Ltd.

- 6 The mixed land use encompasses a variety of activities, including, ovine and bovine dairy farming and dry-stock farming, geothermal energy generation, lucerne cropping, and beef and sheep grazing carried out by both WPL and its lessees.
- 7 The management of the Estate seeks to achieve an appropriate balance between commercial and environmental sustainability, including the planned set-aside of up to 5,000ha or 20% of the Estate for ecological and landscape protection, and to safeguard slope stability on erosion prone land. Beyond that, current and ongoing development of the Estate makes a significant and sustained contribution to the local and regional economies.
- 8 All riparian and wetland areas have dedicated management plans to enhance and encourage their growth and development. These areas are protected with over 250km fencing (with a further 200km identified to follow). WPL has permanently retired 750ha of riparian areas with a further 500ha identified for future retirement. The targeted average setback along the Waikato River is 75m, with several areas exceeding 150m.
- 9 In particular, as part of the commitment to riparian management stock are excluded from all water bodies within the Estate; riparian margins are progressively planted over time with native species and kept pest and weed free; and variable setbacks between 10m – >50m are achieved from water bodies (depending on topography) in all livestock and pastoral farming areas on the Estate.
- 10 The WPL management team is based at Broadlands and covers a range of disciplines, including, business and farm planning, estate management and land economy, geographic information systems and cartography, natural resources planning, and soil conservation.
- 11 WPL has an acute awareness of the environmental challenges and has established and maintained an Estate wide monitoring programme and employs a dedicated environmental team (as noted above) to ensure the enhancement and development of its existing good management practices.
- 12 For example, in the development of its environmental management plans and monitoring programmes WPL has taken into account the views of hapu and iwi, both at a local and regional level, to ensure that the appropriate cultural issues are addressed and properly provided for. A number of the measures taken on the Estate such as stock exclusion fencing and the establishment of riparian strips along waterways respond directly to known hapu and iwi sediment controls and water quality concerns.
- 13 Put simply, the Estate is the inspiration of three visionary (shareholding) “New Zealand families committed to the best

environmental practice and doing the 'right thing' by the land". WPL has created "one of the largest and most environmentally sustainable pastoral farms in the Southern Hemisphere. Captioned as one of the boldest developments in New Zealand's agricultural history, it is a project on a large scale." The Estate is "an intergenerational investment and is a legacy for both present and future generations".¹

Key points made in the WPL submissions

14 Key WPL submission points are:

14.1 WPL applauds the investment made by WRC in the collaborative approach for preparing PC1 and the Variation and strongly supports the sub-catchment approach to addressing water quality issues in PC1 and the Variation, but considers that a number of specific amendments are required (**words coloured red and blue in the submissions on PC1 and the Variation**) to ensure that PC1 and the Variation give effect to this approach within the 10 year life of the plan change in an efficient and effective way. In summary:

- (a) These amendments are based on an adaptive management and mitigation approach (founded on sound science and risk assessment).
- (b) They are designed to expedite both short term and long term improvements in water quality and restoration and protection of water quality at scale at an enterprise level or sub-catchment level.
- (c) This is achieved (primarily) by focusing on activity categories for farming, commercial vegetable production, and land use change; and by ensuring that the sub-catchment approach in the Variation is firmly and consistently embedded throughout all relevant Variation provisions.

14.2 For the purpose of giving effect to the National Policy Statement for Freshwater Management 2017 (**NPS-FM 2017**)² the stretch of the Waikato River catchment between the Lake Taupo control gates and Ohaaki-Ohakuri should be typified as a "river".

¹ www.pamunewzealand.com - Pamu Farms of New Zealand, Our Company, Who We Work With, Wairakei Estate (accessed 14 September 2018).

² The reference to the National Policy Statement for Freshwater Management has been updated in this further submission to refer to the NPS-FM 2017 that updated the NPS-FM 2014 in August 2017 to incorporate amendments to the NPS-FM and came into force on 17 September 2017 in accordance with the National Policy Statement for Freshwater Management Order 2017.

- 14.3 Existing freshwater quality in this stretch of the Waikato River (e.g. for the Estate) is generally consistent with Attribute State A for all relevant values and attributes pertaining to rivers, namely, nitrate, ammonia, and *E.coli*.
- 14.4 To the extent that the local authority has a discretion to set freshwater objectives regarding total nitrogen or total phosphorus for this stretch of the Waikato River, there is limited information that could support the exercise of such discretion.
- 14.5 Objectives, policies and methods (including rules) designed for managing water quality in the stretch of the Waikato River above Ohaaki-Ohakuri should therefore be focused on "maintaining" overall freshwater quality in the sub-catchment. This accords with the objective of protecting the health of the river in the Vision and Strategy.
- 14.6 The specific provisions as amended by the WPL submission are (when compared with the Variation as notified) the most efficient and effective way of achieving sustainable management, and providing opportunities for economic growth and employment. They will give effect to the Vision and Strategy for the Waikato River, and are consistent with the Collaborative Stakeholder Group's (**CSG**) policy selection criteria.
- 14.7 The long-term planning objectives for the Estate are well aligned with the Vision and Strategy for the Waikato River. Analysis of the Variation (as noted above) has highlighted several areas where WPL considers that amendments can be made which not only focus on achieving the Vision and Strategy, but also allow for a greater participation by properties and enterprises to take actions (at scale) which will bring about the behavioural and farming changes requisite to meet the objectives of the Vision and Strategy.
- 14.8 The Estate is operated as a single enterprise, managing the individual farming and other activities of the lessees via the terms and conditions of their leases. The size and scale of the Estate means that a sub-catchment approach is the most appropriate way to manage the natural resources to benefit both the productivity of the land and also the ecological function of the environment. This requires careful planning for farm layout and operation together with ongoing performance monitoring to ensure water quantity and quality objectives are maintained.
- 14.9 WPL therefore supports a sub-catchment based approach that will allow the Estate and other properties and

enterprises in the region to act in the best interests of the environment through the ability to undertake collective mitigations and maintain economic productivity goals through efficiently managing the finite natural resources that are available within each sub-catchment.

14.10 In particular, the amendments sought to the Variation by the WPL submission will ensure that the sub-catchment approach is given full effect in both the short and long term without unduly restricting sustainable development, will encourage collaboration between properties in single and multiple ownership to establish enterprises, will foster integrated management, and will reduce compliance costs.

15 Reasons for the WPL submissions on PC1 and the Variation are:

15.1 PC1 and the Variation as notified will not promote sustainable management of natural and physical resources in accordance with pt 2 of the Resource Management Act 1991 (**RMA**).

15.2 PC1 and the Variation as notified is not within the functions of regional councils as provided for in s 30 of the RMA.

15.3 The objectives of PC1 and the Variation (as notified) are not the most appropriate way to achieve sustainable management.

15.4 The provisions in PC1 and the Variation (as notified) are not the most appropriate way to achieve the objectives.

15.5 PC1 and the Variation as notified will not promote opportunities for economic growth or employment.

15.6 The evaluation reports for PC1 and the Variation do not (in relevant part) comply with the requirements of s 32 of the RMA.

15.7 The evaluation reports are not (fully) supported by evidence of probative value.

15.8 PC1 and the Variation as notified do not comply with relevant provisions in pt 5 of the RMA, including: s 63, s 65, s 66, s 67, s 68, s 69 and s 70.

15.9 PC1 and the Variation as notified are not consistent with or do not give effect to the NPS-FM 2017.

- 15.10 PC1 and the Variation as notified are not consistent with or do not give effect to the operative regional policy statement (**RPS**).
- 15.11 PC1 and the Variation as notified are not consistent with remaining provisions in the operative Waikato Regional Plan (**WRP**) that are not proposed to be changed.
- 15.12 PC1 and the Variation as notified (in respect of controls on land) will render interests in land incapable of reasonable use.
- 15.13 PC1 and the Variation as notified do not comply with relevant provisions in schedule 1 of the RMA.
- 15.14 The rules in PC1 and the Variation as notified are not clear and simple, or capable of consistent application.
- 15.15 PC1 and the Variation as notified do not achieve the key WPL submission points included in paragraph 13 (above) of this submission.

Overview of the specific WPL submission points

- 16 In overview, the specific WPL submission points made on PC1 and the Variation (see Appendices A, B, C, D, and E attached to the original WPL submissions) seek the following amendments to the notified provisions:

Background and Explanation

- 16.1 WPL made submissions on PC1 regarding the Background and Explanation (3.11) to ensure that land use change can occur in sub-catchments where activities do not pose a "high risk" and can be suitably mitigated via consent conditions, to provide a foundation for introduction of a more refined nitrogen cap, and to clarify the short-term (2016-2026) and long-term (2026-2096) time horizons for delivering anticipated environmental outcomes.

Values

- 16.2 WPL made submissions on the Variation regarding the Values (3.11.1) to ensure that springs are referenced consistently throughout PC1.

Objectives

- 16.3 WPL made submissions on PC1 regarding Objectives 1 and 2 (3.11.2) focused on "maintenance" of water quality in sub-catchments where water quality is high, and to ensure

that social and economic wellbeing is appropriately recognised.

- 16.4 WPL also made submissions on PC1 and the Variation regarding the reasons for adopting Objectives 1, 3 and 4 to provide an adequate foundation for appropriate permitted activity rules, to ensure that PC1 adopts a consistent approach to encouraging resource consent applications to be made at property, enterprise, and sub-catchment levels, and to enable enterprises capable of delivering the anticipated environmental outcomes at scale to apply for consent under PC1 from 2016 onwards to maximise compliance and regulatory efficiency.

Policies

- 16.5 WPL made submissions on PC1 regarding Policies 1, 2, 4, 5, 8, 14, and 16 (3.11.3) focused on “maintenance” of water quality in sub-catchments where water quality is high, to ensure that PC1 adopts a consistent approach to encouraging resource consent applications to be made at property, enterprise, and sub-catchment levels, and to enable enterprises capable of delivering the anticipated environmental outcomes at scale (via adaptive management and and mitigation provisions included in Farm Environment Plans) to apply for consent under PC1 from 2016 onwards to maximise compliance and regulatory efficiency.
- 16.6 In particular, the WPL submissions regarding Policies 6, 7, 10, 11, 12, and 13 ensure that PC1 adopts a consistent approach to encouraging resource consent applications to be made at property, enterprise, and sub-catchment levels, and that a consistent approach is adopted by the PC1 policy framework concerning both diffuse and point-source discharges.
- 16.7 Additionally, the WPL submissions on PC1 and the Variation also seek amendments to the Glossary of Terms,³ and to insert new Schedules 2, 3, and 4 into PC1 to underpin a consistent approach to encouraging resource consent applications to be made at property, enterprise, and sub-catchment levels (including adaptive management and mitigation methods).

³ In addition, these further submissions made by WPL also address the decisions requested by other submitters regarding the definitions pertaining to Certified Farm Nutrient Advisors, Enterprises, the Nitrogen Reference Point, Properties, and the 75th percentile nitrogen loss value.

Methods

- 16.8 WPL made submissions on PC1 regarding Methods 3.11.4.3, 3.11.4.5, 3.11.4.7, 3.11.4.8, 3.11.4.10, and 3.11.4.11 to ensure that Farm Environment Plans are prepared and monitored by appropriately qualified or experienced persons regardless of local authority certification, to ensure that PC1 adopts a consistent approach to encouraging resource consent applications to be made at property, enterprise, and sub-catchment levels, and to enable enterprises capable of delivering the anticipated environmental outcomes at scale (via adaptive management and and mitigation provisions included in Farm Environment Plans) to apply for consent under PC1 from 2016 onwards to maximise compliance and regulatory efficiency.

Rules

- 16.9 WPL made submissions on PC1 and the Variation regarding Rules 3.11.5.2, 3.11.5.4, 3.11.5.6, and 3.11.5.7 to ensure that PC1 adopts a consistent approach to encouraging resource consent applications to be made at property, enterprise, and sub-catchment levels, to enable enterprises capable of delivering the anticipated environmental outcomes at scale (via adaptive management and and mitigation provisions included in Farm Environment Plans) to apply for consent under PC1 from 2016 onwards to maximise compliance and regulatory efficiency, and to make express provision for the transfer of land use consents and discharge permits.

Schedules

- 16.10 WPL made submissions on PC1 regarding Schedules B and 1 to ensure that appropriate models can be used to calculate robust Nitrogen Reference Points consistent with best practice, as an alternative to merely relying on the OVERSEER model alone.

Tables

- 16.11 WPL made submissions on PC1 regarding Table 3.11-1 to ensure that more appropriate, defensible, and robust short-term and long-term freshwater objectives are adopted as the baseline for deciding resource consent applications during the period 2016-2026.

Maps

- 16.12 WPL made submissions on PC1 regarding Map 3.11-2 to ensure that sub-catchments are defined at an appropriate

scale (e.g. by subdividing sub-catchment 66 to create new sub-catchments 66A and 66B).

16.13 Beyond that, the WPL submissions made on PC1 and the Variation address all other notified provisions and reserve the rights to retain or amend them by similar wording to like effect, and to make such alternative, consequential or further amendments as may be required either to promote sustainable management or to give effect to the WPL submissions.

Support or opposition to submissions

17 For the avoidance of doubt, WPL does not resile from the decisions sought in its original submissions made on PC1 and the Variation. These further submissions are in addition to the original submission points made on PC1 and the Variation. WPL wishes to confirm that it has made submissions on all of the provisions of PC1 and the Variation.

18 WPL supports or opposes the submissions made by:

18.1 The original submitters named in column 1 of Appendix F (**attached**) of this further submission;

18.2 Whose submitter ID numbers are given in column 2 of Appendix F of this further submission; and

18.3 Whose addresses are listed in Appendix G (**attached**) of this further submission.

19 The submissions that WPL supports or opposes are indicated by reference to:

19.1 The submission point ID number in column 3 of Appendix F of of this further submission;

19.2 The summary of the decision sought by the original submitter (together with any relevant provisions of the proposals) in column 4 of Appendix F of of this further submission; and

19.3 The further submission made by WPL in column 5 of Appendix F of of this further submission.

Reasons for support or opposition

20 The submission points made by the original submitters are:

20.1 **Supported** by WPL because they:

- (a) Are generally consistent with the key submission points, the general and detailed reasons, and the specific decisions sought by WPL in its original submissions made on PC1 and the Variation (as summarised in the general overview of the WPL submissions in paragraph 16 above of this further submission); and
- (b) Provide avenues for (appropriate) further amendments to the notified provisions in the proposals.

20.2 **Supported** and **opposed** by WPL in relevant part because:

- (a) They are generally consistent with the key points made in the WPL submissions on PC1 and the Variation; and
- (b) Insofar as they are consistent with the specific decisions sought in the WPL submissions on PC1 and the Variation, they provide avenues for (appropriate) further amendments to the notified provisions in the proposals.

20.3 **Opposed** by WPL because they are not consistent with the key submission points, the general and detailed reasons, and the decisions sought by WPL in its submissions made on PC1 and the Variation (as summarised in the general overview of the WPL submissions in paragraph 16 above of this further submission).

Decisions sought

21 WPL seeks that:

- 21.1 The submission points made by the original submitters (identified in columns 3 and 4 of Appendix F to this further submission) **supported** by WPL be allowed.
- 21.2 The submission points made by the original submitters (identified in columns 3 and 4 of Appendix F to this further submission) **supported** and **opposed** by WPL be allowed only insofar as the specific decisions requested by the original submitters are consistent with the WPL submissions.⁴

⁴ As summarised in the general overview of the WPL submissions in paragraph 16 above of this further submission.

- 21.3 The submission points made by the original submitters (identified in columns 3 and 4 of Appendix F to this further submission) **opposed** by WPL be disallowed.
- 22 The Director General of Conservation's submission on the Variation appears to be beyond scope.
- 23 WPL wishes to be **heard** in support of its further submission.
- 24 WPL agrees to participate in mediation or other alternative dispute resolution.

 Trevor Daya-Winterbottom

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17 September 2018

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APPENDIX F – PLAN CHANGE 1 & VARIATION 1

Further submissions made by Wairakei Pastoral Ltd

Submitter Name	Submitter ID	Submission Point ID	Decision Requested by Submitter	WPL Further Submission
A				
Advisory Committee on Regional Environment (ACRE)	72441	PC1-9500	Objective 1 Oppose the provision with amendments AMEND Objective 1 to make PPC1's timeframe 50 years with a short term target of 20% reduction in emissions.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-9502	Objective 3 Oppose the provision with amendments AMEND Objective 3 to make PPC1's timeframe 50 years with a short term target of 20% reduction in emissions.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-9536	Policy 1 Support the provision with amendments AMEND Policy 1 a) to read: " <u>Enabling activities with a low level of contaminant discharge to water bodies, and</u> " AND AMEND Policy 1 b) to read: " <u>Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges in order, from highest to least.</u> "	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-9529	Policy 6	WPL opposes the

			<p>Oppose the provision with amendments</p> <p>AMEND Policy 6 Paragraph 1 to read: "Except as provided for in <u>Policy 1 and 2 (for low level discharges)</u> and <u>Policy 16</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."</p>	<p>submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-9571	<p>Rule 3.11.5.2</p> <p>Support the provision</p> <p>CONSIDER supporting programmes that support the retirement of vulnerable areas. Rule 3.11.5.2.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-11209	<p>Rule 3.11.5.3</p> <p>Oppose the provision with amendments</p> <p>CONSIDER supporting programmes that support the retirement of vulnerable areas. Rule 3.11.5.3.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-11208	<p>Rule 3.11.5.4</p> <p>Support the provision with amendments</p> <p>AMEND Rule 3.11.5.4 Matters of Control ii. and iii. to provide for exceptions to the maintaining or reductions of contaminants and exceedances of the Nitrogen Reference Point in the case of low level discharges not required to be reduced. AND RETAIN the OVERSEER Model as the</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p>preferred modelling tool for PPC1. AND AMEND Rule 3.11.5.4.1 to provide for the 50th percentile nitrogen leaching value to be prioritised for Farm Environment Plans and in Matters of Control in consideration of resource consents. AND ANY consequential amendments. AND CONSIDER supporting programmes that support the retirement of vulnerable areas.</p>	
		PC1-9515	<p>Rule 3.11.5.5 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.5 Matters of Control iii. to provide for exceptions to the maintaining or reductions of contaminants and exceedances of the Nitrogen Reference Point in the case of low level discharges not required to be reduced. AND CONSIDER supporting programmes that support the retirement of vulnerable areas.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-9573	<p>Rule 3.11.5.6 Support the provision</p> <p>CONSIDER supporting programmes that support the retirement of vulnerable areas. Rule 3.11.5.6.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-11211	<p>Schedule B Support the provision</p> <p>RETAIN the OVERSEER Model as the preferred modelling tool for PPC1.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be</p>

				disallowed.
		PC1-12333	<p>Schedule 1 Support the provision with amendments</p> <p>AMEND Schedule 1 (5)(a) by adding at the beginning of the clause "With the exception of low level discharges" or "a percentile level not greater than any other levels requiring reductions." AND AMEND Schedule 1(5)(b) to refer to the 50th percentile in place of the 75th percentile in lines 1 and 2.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-9595	<p>Schedule 1 Support the provision with amendments</p> <p>AMEND Schedule 1 paragraph 2 to add the words "where required" after the word 'reduce'.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
Ata Rangi 2015 Limited Partnership	74045	PC1-6090	<p>Objective 1 Oppose the provision</p> <p>Objective 1: CONSIDER reviewing and making amendments to the Section 32 evaluation of the scenarios considered for PPC1 AND AMEND PPC1 as a consequence of the review AND MAKE any consequential amendments to Table 3.11-1 AND CONSIDER granting relief sought regarding land use flexibility, including land use change and offset mitigation opportunities.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own

				submissions.
		PC1-6100	<p>Objective 3 Oppose the provision with amendments</p> <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</u> 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 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."</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-6113	<p>Objective 4 Oppose the provision with amendments</p> <p>AMEND Objective 4 as follows: "A staged approach to <u>changing</u> e-enables people and communities to provide for their the <u>management of land use and related diffuse discharges</u> undertake adaptive enables people and communities to <u>continue to</u> provide for their social, economic and cultural well-being in the short term (the period to 2026) <u>and to continue to realise</u> the values and uses while: a. <u>considering the values and uses when</u> taking action to achieve the attribute targets for the Waikato and Waipa Rivers in Table 3.11-1; and b. recognising that further contaminant reductions will be required by subsequent</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			regional plans and signalling anticipated future management approaches that will be needed in order to meet Objective 1."	
		PC1-6120	<p>Policy 1 Oppose the provision with amendments</p> <p>AMEND PPC1 to define or explain what is meant by 'low level of contaminant discharge' and 'high levels of contaminant discharge'.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-6126	<p>Policy 4 Support the provision with amendments</p> <p>AMEND PPC1 to provide a definition or explanation of 'low discharges'. AND submitter reserves its position, subject to acceptance of its relief sought elsewhere in its submission.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-6133	Policy 6	WPL supports and

		<p>Oppose the provision</p> <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 June 2015 and 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> <ul style="list-style-type: none"> <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> <u>ii. The creations of positive economic, social and cultural benefits for the Waikato Region.</u> <p><u>Policy [X2] - Flexibility for land use change</u> <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,</u></p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p><u>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>	
		PC1-6135	<p>Policy 7 Oppose the provision with amendments</p> <p>AMEND Policy 7 as follows: "Prepare for future diffuse discharge reduction and any future property or enterprise level allocation of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will be required by subsequent regional plans, by implementing the policies and methods in this chapter. To ensure this occurs, Collect information and undertake research for the purposes of developing future regional plan changes to support this including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'. Any future land allocation should consider the following principles: a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e. where the effect on the land and receiving</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			waters will be the same, like land is treated the same for the purposes of allocation)' and b. Allowance for flexibility of development of tangata whenua ancestral land; and c. Minimise social disruption and costs in the transition to the 'land suitability' approach; and d. Future allocation decisions should take advantage of new data and knowledge."	
		PC1-6172	Method 3.11.4.7 No specific decision was requested.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-6175	Method 3.11.4.8 No specific decision was requested.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-6180	Method 3.11.4.11 No specific decision was requested.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-6192	Rule 3.11.5.2	WPL supports and

			<p>Oppose the provision with amendments</p> <p>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..."</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-6195	<p>Rule 3.11.5.5</p> <p>Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.3 so that Farm Environment Plans across all catchments are provided to Waikato Regional Council at the same time. [Refer to relief elsewhere regarding certainty of meaning and implementation of PPC1 methods].</p>	<p>Oppose</p>
		PC1-6198	<p>Rule 3.11.5.6</p> <p>Support the provision with amendments</p> <p>No specific decision was requested.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-6201	<p>Rule 3.11.5.7</p> <p>Oppose the provision</p> <p>ADD a NEW restricted discretionary activity Rule 3.11.5.7A as follows:</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points</p>

			<p><u>"Rule 3.11.5.7A 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 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> <u>1. Woody vegetation to farming activities; 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>Subject to the following standards and terms:</u> <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> <u>b) Cattle, horses, deer and pigs are excluded from water bodies in accordance with Schedule C. Waikato Regional Council restricts its discretion over the following matters:</u> <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</u></p>	<p>made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p><u>Environment Plan.</u></p> <p><u>iv. The term of the resource consent.</u></p> <p><u>v. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent.</u></p> <p><u>vi. The time frame and circumstances under which the consent conditions may be reviewed."</u></p> <p><u>AND ADD a NEW restricted discretionary activity Rule 3.11.5.7B:</u></p> <p><u>"Rule 3.11.5.7B Restricted Discretionary activity rule - Land Use Change</u></p> <p><u>Notwithstanding any other rule in this Plan, in order to achieve a staged approach to change, any of the following 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; 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>4. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5. 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</u></p>	
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			<p><u>C.</u> <u>Waikato Regional Council restricts its discretion over the following matters:</u> i. <u>Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers.</u> ii. <u>The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens.</u> iii. <u>The need for and the content of a Farm Environment Plan, including the use of offset mitigation measures.</u> iv. <u>The term of the resource consent.</u> v. <u>The monitoring, record keeping, reporting, and information provision requirements for the holder of the resource consent.</u> vi. <u>The time frame and circumstances under which the consent conditions may be reviewed."</u> 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 non-complying activities:</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 Waipa catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares..." 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>	
		PC1-6227	<p>Schedule B Oppose the provision with amendments</p>	<p>WPL supports and opposes the submission because it</p>

			AMEND PPC1 to include provision for the establishment of an auditing procedure or other mechanism which ensures the accuracy and reliability of the input data and use of the OVERSEER Model for the purposes of establishing a Nitrogen Reference Point. For example, through the Farm Environment Plan process.	is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-466	Schedule B Oppose with amendments AMEND the date range in Schedule B for the assessment of NRP to include the years 2016/2017, in addition to 2014/2015 and 2015/2016 AND AMEND to make any consequential amendments.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-471	Schedule B Oppose with amendments AMEND Schedule B to provide for variation of the OVERSEER Model standards to allow measured soil C and N levels to be included in the analysis so that actual farm soil conditions are reflected in the outcome.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the

			AND AMEND Schedule B so that such variation of the values of N mobilisation potential may only occur if the variation is validated by a suitably qualified person.	submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-6239	<p>Schedule 1 Support the provision with amendments</p> <p>AMEND and/or include further information in PPC1 in order to provide better certainty regarding Waikato Regional Council's expectations as to the content and level of detail which will be required for Farm Environment Plans.</p> <p>AND AMEND to clarify the relationship/interpretation of the stock exclusion requirements between Schedule C and Schedule 1 Farm Environment Plans.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-6249	<p>Table 3.11-1 Oppose the provision with amendments</p> <p>AMEND numeric water quality targets in table 3.11-1 to align with Scenario 2.</p> <p>AND AMEND in accordance with relief sought regarding land use change, land use flexibility and off-set mitigation.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by

				WPL in its own submissions.
		PC1-6266	<p>Enterprise definition Oppose the provision with amendments</p> <p>AMEND to provide confirmation that the term 'enterprise' is not restricted to a single dairy unit and may include more than one dairy unit in circumstances where the land is held in single ownership to support the principal land use. AND AMEND the definition of 'Enterprise/s' to read as follows (or similar to address reasons for submission): "<u>Enterprise/s: means one or more parcels of land held in single or multiple ownership under the ultimate common control of one owner to support the principal land use, which may include more than one dairy unit, or land which the principal land use is reliant upon, and constitutes a single operative unit for the purposes of management. An enterprise is considered to be within a sub-catchment if more than 50% of that enterprise is within the sub-catchment, except that where the enterprise falls within more than one sub-catchment it may nevertheless be treated as a single enterprise.</u>"</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-6284	<p>Nitrogen Reference Point definition Support the provision with amendments</p> <p>AMEND to provide (Definition - Nitrogen Reference Point) confirmation of which version of the OVERSEER Model applies and/or what 'other model approved by Council' will apply AND AMEND to provide information on how it will ensure consistency for the purposes of Nitrogen Reference Point reporting, implementation, and</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this

			<p>compliance AND refer to relief sought above regarding data validation and need for auditing system for data set used for calculating a Nitrogen Reference Point.</p>	<p>would be consistent with the specific decisions sought by WPL in its own submissions.</p>
Auckland/Waikato Fish and Game	74085	PC1-10806	<p>Objective 1 Support the provision with amendments</p> <p>AMEND Table 3.11-1 so that 80 year attributes and targets are consistent with ecosystem health measures and achieving healthy freshwater ecosystems AND AMEND to include a range of attribute targets for all sites and sub-catchments that provide a clear linkage and assessment and measurement chain from the desired freshwater outcome to required reductions in nutrient loss from land by way of an allocation system AND AMEND to include appropriate sites for every sub-catchment AND AMEND to ensure clear linkages between Tables 3.11-1 and Table 3.11-2 AND AMEND Table 3.11-1 to add missing targets and limits, including ecosystem health based limits and targets AND AMEND Table 3.11-1 to adopt the relief sought in Appendix 1 of the submission (pages 66 to 69).</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1559	<p>Objective 1 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10806, except as modified by their V1 submission: [AMEND Table 3.11-1 so that 80 year attributes and targets are consistent with ecosystem health</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the</p>

			<p>measures and achieving healthy freshwater ecosystems</p> <p>AND AMEND to include a range of attribute targets for all sites and sub-catchments that provide a clear linkage and assessment and measurement chain from the desired freshwater outcome to required reductions in nutrient loss from land by way of an allocation system</p> <p>AND AMEND to include appropriate sites for every sub-catchment</p> <p>AND AMEND to ensure clear linkages between Tables 3.11-1 and Table 3.11-2</p> <p>AND AMEND Table 3.11-1 to add missing targets and limits, including ecosystem health based limits and targets AND AMEND Table 3.11-1 to adopt the relief sought in Appendix 1 of the submission (pages 66 to 69).]</p>	<p>submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10790	<p>3.11.2 Objectives</p> <p>Support the provision with amendments</p> <p>ADD a NEW Objective to read: <u>"New Objective: Restoration and protection of ecosystem health</u> <u>Ecosystem health is achieved in Waikato rivers, lakes and wetlands within 80 years as a result of staged reductions in point and non-point source discharges."</u></p> <p>AND ADD a NEW Objective to read: <u>"New Objective: Classification, Maintenance and Enhancement of Significant Wetlands</u> <u>a) All wetlands within the Waikato and Waipā catchments are assessed and added to Table 3.7.7 of the parent plan.</u> <u>b) Wetlands within the Waikato and Waipā catchments are maintained or enhanced to protect their ecosystems,</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<u>including hydrological functioning and extent."</u>	
		PC1-10809	<p>Objective 3 Support the provision with amendments</p> <p>AMEND the heading of Objective 3 to read: "Short-term improvements in water quality in the first stage of restoration and protection water quality for each sub- catchment and Freshwater Management Unit <u>as required by the Vision and Strategy</u>"</p> <p>AND AMEND the explanatory narrative to read: "Actions put in place and implemented by 2036 to reduce discharges of nitrogen, phosphorous, sediment and microbial pathogens, have achieved thirty percent of the required change between current water quality and the 80 year water quality attribute targets in Table 3.11-1 <u>once this Plan has been operative for 20 years.</u>"</p> <p>AND AMEND to define and refine short term targets</p> <p>AND AMEND Table 3.11-1 to include short-term attribute targets for all sites</p> <p>AND AMEND Table 3.11-1 to include a range of attributes and attribute targets that enable an accurate characterisation of water quality and ecosystem health AND that ensure freshwater resources are sustainably managed, provide for the habitat of trout and indigenous fish and the significant values of wetlands, AND that measure progress toward outcomes and enable reviews to assess the effectiveness of PPC1</p> <p>AND AMEND the Table 3.11-1 numerical 80-year targets to give effect to the water quality objectives of the Vision and Strategy</p> <p>AND AMEND Table 3.11-1 to adopt the relief sought in Appendix 1 of the submission (pages</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			66 to 69) for rivers and streams, and add appropriate indicators for lakes and wetlands.	
		V1PC1-1560	<p>Objective 3 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10809, except as modified by their V1 submission: [AMEND the heading of Objective 3 to read: "Short-term improvements in water quality in the first stage of restoration and protection water quality for each sub- catchment and Freshwater Management Unit <u>as required by the Vision and Strategy</u>" AND AMEND the explanatory narrative to read: "Actions put in place and implemented by 2036 to reduce discharges of nitrogen, phosphorous, sediment and microbial pathogens, have achieved thirty percent of the required change between current water quality and the 80 year water quality attribute targets in Table 3.11-1 <u>once this Plan has been operative for 20 years.</u>" AND AMEND to define and refine short term targets AND AMEND Table 3.11-1 to include short-term attribute targets for all sites AND AMEND Table 3.11-1 to include a range of attributes and attribute targets that enable an accurate characterisation of water quality and ecosystem health AND that ensure freshwater resources are sustainably managed, provide for the habitat of trout and indigenous fish and the significant values of wetlands, AND that measure progress toward outcomes and enable reviews to assess the effectiveness of PPC1 AND AMEND the Table 3.11-1 numerical 80-year</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.

			targets to give effect to the water quality objectives of the Vision and Strategy AND AMEND Table 3.11-1 to adopt the relief sought in Appendix 1 of the submission (pages 66 to 69) for rivers and streams, and add appropriate indicators for lakes and wetlands.]	
		PC1-12569	<p>Policy 1 Support the provision with amendments</p> <p>AMEND Policy 1 to read: <u>"...e. Progressively increasing riparian buffering of rivers, streams, drains, wetlands and lakes."</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10875	<p>Policy 1 Support the provision with amendments</p> <p>AMEND Policy 1 to read: <u>"...a. Enabling, through permitted activity rules, activities with a low level of contaminant discharge to water bodies provided those discharges do not increase and adverse effects, including cumulative effects, are avoided; and</u> <u>b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges so as to avoid adverse effects, including cumulative effects, through the use of resource consents; and</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own

			<p>...</p> <p><u>d. Allocating diffuse discharges to land based on science defined limits and targets, and progressively phasing out the over-allocation of contaminant discharges over time; and ..."</u></p>	submissions.
		V1PC1-1561	<p>Policy 1 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10875, except as modified by their V1 submission: [AMEND Policy 1 to read: "...a. Enabling, <u>through permitted activity rules</u>, activities with a low level of contaminant discharge to water bodies provided those discharges do not increase <u>and adverse effects, including cumulative effects, are avoided</u>; and b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges <u>so as to avoid adverse effects, including cumulative effects, through the use of resource consents</u>; and ...</p> <p><u>d. Allocating diffuse discharges to land based on science defined limits and targets, and progressively phasing out the over-allocation of contaminant discharges over time; and..."]</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1590	<p>Policy 1 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-12569, except as modified by their V1 submission: [AMEND Policy 1 to read: "...e. Progressively increasing riparian buffering</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the

			of rivers, streams, drains, wetlands and lakes."]	submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-12692	<p>Policy 2 Support the provision with amendments</p> <p>AND AMEND Policy 2(a) to read: "a. Taking a tailored, risk based approach to define mitigation actions on the land that will reduce <u>which will achieve required reductions specified in this plan in</u> diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, with the mitigation actions to be specified in a Farm Environment Plan either associated with as part of a resource consent; or in specific requirements established by participations in a Certified Industry Scheme;" AND DELETE Policy 2(b).</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10876	<p>Policy 2 Support the provision with amendments</p> <p>AMEND Policy 2 to ensure consistency with the amendments sought in Appendix 1 of this submission AND AMEND Policy 2(d) to read: "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</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific

			<p>to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment in accordance with the short and long term targets in Table 3.11-1, the sub-catchment reduction targets and timeframes in Table 3.11-2, and the sub-catchment nitrogen leaching requirements in Schedule E.; and..."</p>	<p>decisions sought by WPL in its own submissions.</p>
		PC1-10878	<p>Policy 4 Support the provision with amendments</p> <p>AMEND Policy 4 to read: "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 achievement of Objective 3 is not compromised and significant adverse effects are avoided..."</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1564	<p>Policy 4 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10878, except as modified by their V1 submission: [AMEND Policy 4 to read: "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</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent</p>

			achievement of Objective 3 is not compromised and significant adverse effects are avoided..."]	with the specific decisions sought by WPL in its own submissions.
		PC1-10879	<p>Policy 6 Support the provision with amendments</p> <p>AMEND Policy 6 to read: "... Land use change consent applications that demonstrate clear and, enduring and meaningful decreases in existing diffuse discharges..."</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-251	<p>Policy 6 Support with amendments</p> <p>AMEND Policy 6 so that it provides appropriate direction to land owners and decision makers applying Rule 3.11.5.7. AND AMEND to ensure that the cumulative effects of a proposed land use change are considered in addition to any improvement from current discharge levels. AND AMEND to read: '...Land use change consent applications that demonstrate clear and, enduring, and meaningful decreases in the diffuse discharge of nitrogen, phosphorous, sediment or microbial pathogens will generally be granted considered only after assessing the cumulative effects of the</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.

			<u>whole activity for which consent is sought, against the limits and targets in Table 3.11-1.'</u>	
		V1PC1-1565	<p>Policy 6 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10879, except as modified by their V1 submission: [AMEND Policy 6 to read: "... Land use change consent applications that demonstrate clear and, enduring <u>and meaningful</u> decreases in existing diffuse discharges..."]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10880	<p>Policy 7 Support the provision with amendments</p> <p>AMEND PPC1 to define and include the schedule in Appendix 1 of this submission which shows the allocation status of nutrient loads in sub-catchments AND AMEND to ensure that farming activities comply with a nitrogen leaching rate which is based on allocating the total allowable load of nitrogen for the sub-catchment on the basis of either a flat per hectare allocation of nitrogen leaching (~15khN/ha/yr), or a nitrogen leaching allowance per hectare based on an allocation defined by natural carrying capacity AND AMEND to enable users undertaking farming activities to manage discharges allocated on a sub-catchment level to make further reductions</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			in the future, including provision for trading of contaminant loss rates in the same sub-catchment.	
		V1PC1-1566	<p>Policy 7 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10880, except as modified by their V1 submission: [AMEND PPC1 to define and include the schedule in Appendix 1 of this submission which shows the allocation status of nutrient loads in sub-catchments AND AMEND to ensure that farming activities comply with a nitrogen leaching rate which is based on allocating the total allowable load of nitrogen for the sub-catchment on the basis of either a flat per hectare allocation of nitrogen leaching (~15khN/ha/yr), or a nitrogen leaching allowance per hectare based on an allocation defined by natural carrying capacity AND AMEND to enable users undertaking farming activities to manage discharges allocated on a sub-catchment level to make further reductions in the future, including provision for trading of contaminant loss rates in the same sub-catchment.]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1- 10959	<p>Method 3.11.4.7 Support the provision with amendments</p> <p>AMEND Method 3.11.4.7 to read: "3.11.4.7 Information needs to support any <u>current and</u> future allocation. Gather information and commission appropriate scientific research to inform any current and</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the

			<p>future framework for the allocation of diffuse discharge including:</p> <p>a. Implementing processes that will support the <u>revision</u> and setting of property or enterprise-level diffuse discharge limits <u>now and</u> in the future to support sub-catchment reviews..."</p>	<p>submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1574	<p>Method 3.11.4.7 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10959, except as modified by their V1 submission: [AMEND Method 3.11.4.7 to read: "3.11.4.7 Information needs to support any <u>current and</u> future allocation. Gather information and commission appropriate scientific research to inform any current and future framework for the allocation of diffuse discharge including: a. Implementing processes that will support the <u>revision</u> and setting of property or enterprise-level diffuse discharge limits <u>now and</u> in the future to support sub-catchment reviews..."]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10962	<p>Method 3.11.4.8 Support the provision with amendments</p> <p>AMEND Method 3.11.4.8 as follows: "3.11.4.8 Reviewing Chapter 3.11 <u>and refining</u> and developing an allocation framework for the next Regional Plan Waikato Regional Council will: a. <u>Refine and review discharge and allocation frameworks as part of the rolling review of sub-catchment performance</u> Develop discharge allocation frameworks for individual properties</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent</p>

			and enterprises based on information collected under Method 3.11.4.7, taking into account the best available data, knowledge and technology at the time; and..."	with the specific decisions sought by WPL in its own submissions.
		V1PC1-1575	<p>Method 3.11.4.8 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10962, except as modified by their V1 submission: [AMEND Method 3.11.4.8 as follows: "3.11.4.8 Reviewing Chapter 3.11 <u>and refining</u> and developing an allocation framework for the next Regional Plan Waikato Regional Council will: a. <u>Refine and review discharge and allocation frameworks as part of the rolling review of sub-catchment performance</u> Develop discharge allocation frameworks for individual properties and enterprises based on information collected under Method 3.11.4.7, taking into account the best available data, knowledge and technology at the time; and...""]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10987	<p>Method 3.11.4.11 Support the provision with amendments</p> <p>AMEND Method 3.11.4.11(a) to read: "a. Review and report on the progress towards and achievement of the 80 year water quality objectives of Chapter 3.11 according to amended Table 3.11-1."</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by

				WPL in its own submissions.
		V1PC1-1576	<p>Method 3.11.4.11 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10987, except as modified by their V1 submission: [AMEND Method 3.11.4.11(a) to read: "a. Review and report on the progress towards and achievement of the 80-year water quality objectives of Chapter 3.11 according to amended Table 3.11-1."]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10997	<p>Rule 3.11.5.2 Support the provision with amendments</p> <p>DELETE Rule 3.11.5.2(4)(b)(i) AND AMEND Rule 3.11.5.2.(4)(b)(ii) to read: "15kg nitrogen/hectare/year, whichever is the lesser, over the whole property or enterprise when assessed in accordance with Schedule B; and" AND DELETE Rule 3.11.5.2(4)(c) AND AMEND Rule 3.11.5.2.(4)(e)(i) to read: "There shall be no cultivation within 5 metres of the bed of the waterbody <u>and/or the defined buffer sizes in Schedule D, whichever is the greater;</u> and"</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-399	<p>Rule 3.11.5.2 Oppose</p>	WPL supports and opposes the

			DELETE the proposed amendment to the date in Rule 3.11.5.2(5).	submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1577	<p>Rule 3.11.5.2 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10997, except as modified by their V1 submission: [DELETE Rule 3.11.5.2(4)(b)(i) AND AMEND Rule 3.11.5.2.(4)(b)(ii) to read: "15kg nitrogen/hectare/year, whichever is the lesser, over the whole property or enterprise when assessed in accordance with Schedule B; and" AND DELETE Rule 3.11.5.2(4)(c) AND AMEND Rule 3.11.5.2.(4)(e)(i) to read: "There shall be no cultivation within 5 metres of the bed of the waterbody <u>and/or the defined buffer sizes in Schedule D, whichever is the greater;</u> and"]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10998	<p>Rule 3.11.5.3 Oppose the provision</p> <p>DELETE Rule 3.11.5.3.</p>	WPL supports the submission because it is generally consistent with the decisions

				sought by WPL, and seeks that it should be allowed.
		V1PC1-340	<p>Rule 3.11.5.3 Oppose</p> <p>DELETE the proposed amendment to the dates in Rule 3.11.5.3(5)(a) and (b) AND PROVIDE sufficient resourcing to ensure the implementation of the Rule 3.11.5.3 can occur.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1546	<p>Rule 3.11.5.3 Oppose</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10998, except as modified by their V1 submission: [DELETE Rule 3.11.5.3.]</p>	WPL supports the submission because it is generally consistent with the decisions sought by WPL, and seeks that it should be allowed.
		PC1-10999	<p>Rule 3.11.5.4 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.4 to read: "3.11.5.4 Controlled Activity Rule - Farming activities including multiple farms with a Farm Environment Plan not under a Certified Industry Scheme Rule 3.11.5.4 Controlled Activity Rule - Farming</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be

			<p>activities with a Farm Environment Plan not under a Certified Industry Scheme Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2 the use of land for farming activities (excluding commercial vegetable production) where that land use is not registers to a Certified Industry Scheme, and the associated diffuse discharge ... is a permitted activity until:</p> <ol style="list-style-type: none"> 1. 1 January 2020 for properties or enterprises in Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value; ... 5. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B; and <p>After the dates set out in 1), 2) and 3) above the use of land <u>and associated discharges</u> shall be a controlled activity (requiring resource consent), subject to <u>provided it complies with</u> the following standards and terms:</p> <ol style="list-style-type: none"> a. A Farm Environment Plan has been prepared in conformance with Schedule 1 and has been approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council at the time <u>as part of</u> the resource consent application is lodged, <u>which must be lodged by</u> the dates specified in I-III below; and ... <u>e. Nitrogen Discharges from the properties meets the targets and timeframes set out in Schedule E, as assessed by the Regional Council under the methodology contained in Scheduled B (including Updated Nitrogen Leaching Assessments).</u> <p>Matters of Control: Waikato Regional Council reserves control over</p>	<p>allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p>the following matters:</p> <p>i. The content of the Farm Environment Plan, <u>which in any event must be in accordance with Schedule 1.</u></p> <p><u>i1. Buffers, as specified in Schedule D.</u></p> <p>...</p> <p>iii. The actions, timeframes and other measures to determine the diffuse discharge of nitrogen from the property or enterprise, <u>in accordance with Schedule B as measured by the five year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER, does not increase beyond the property or enterprises Nitrogen Reference Point, unless other suitable measures are specified to ensure that nitrogen discharge is reduced to or maintained at the level specified in Schedule E or the level authorised by any nitrogen discharge rights if a trading scheme is operative within the catchment.</u></p> <p>iv. Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026.</p> <p>...</p> <p>vi. The monitoring, record keeping, reporting and information provision, <u>including public information provision,</u> requirements for the holder of the resource consent to demonstrate and/or monitor compliance with the Farm Environment Plan.</p> <p>vii. The timeframe and circumstances under which the consent conditions may be reviewed of the Farm Environment Plan shall be amended.</p>	
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			<p>viii. Procedures for reviewing, amending and re-certifying re-approving the Farm Environment Plan the resource consent including:</p> <p><u>a) Periodic reviews in accordance with the sub-catchment progress review timeframes as specified in Table 3.11-2.</u></p> <p><u>b) Reviews, initiated by the consent holder under section 128 on the purchase or sale of any nitrogen discharge rights under any operative catchment nitrogen trading scheme, in order to change the level of discharge authorised by the consent in clause iii.</u></p> <p>Dates:</p> <p>I. For Priority 1 sub-catchments, and properties with a Nitrogen Reference Point of greater than 75th percentile nitrogen leaching values, by 1 July 2020</p> <p>...</p> <p>Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected persons.</p> <p><u>Reviews will be subject to limited or public notification based on progress against the sub-catchment progress review targets and timeframes specified in Table 3.11-2."</u></p>	
		V1PC1-366	<p>Rule 3.11.5.4 Oppose</p> <p>DELETE the proposed amendments to the dates in Rule 3.11.5.4(1) and (2) AND PROVIDE sufficient resourcing to ensure the implementation of Rule 3.11.5.4 can occur.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this</p>

				would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1578	<p>Rule 3.11.5.4 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10999, except as modified by their V1 submission: [AMEND Rule 3.11.5.4 to read: "3.11.5.4 Controlled Activity Rule - Farming activities including multiple farms with a Farm Environment Plan not under a Certified Industry Scheme Rule 3.11.5.4 Controlled Activity Rule - Farming activities with a Farm Environment Plan not under a Certified Industry Scheme Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2 the use of land for farming activities (excluding commercial vegetable production) where that land use is not registers to a Certified Industry Scheme, and the associated diffuse discharge ... is a permitted activity until: 1. 1 January 2020 for properties or enterprises in Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value; ... 5. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B; and After the dates set out in 1), 2) and 3) above the use of land and associated discharges shall be a</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>controlled activity (requiring resource consent), subject to <u>provided it complies with</u> the following standards and terms:</p> <p>a. A Farm Environment Plan has been prepared in conformance with Schedule 1 and has been approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council at the time <u>as part of</u> the resource consent application is lodged, which must be lodged by the dates specified in I-III below; and</p> <p>...</p> <p><u>e. Nitrogen Discharges from the properties meets the targets and timeframes set out in Schedule E, as assessed by the Regional Council under the methodology contained in Scheduled B (including Updated Nitrogen Leaching Assessments).</u></p> <p>Matters of Control: Waikato Regional Council reserves control over the following matters:</p> <p>i. The content of the Farm Environment Plan, <u>which in any event must be in accordance with Schedule 1.</u></p> <p>i1. Buffers, as specified in Schedule D.</p> <p>...</p> <p>iii. The actions, timeframes and other measures to determine the diffuse discharge of nitrogen from the property or enterprise, <u>in accordance with Schedule B as measured by the five year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER, does not increase beyond the property or enterprises Nitrogen Reference Point, unless other suitable measures are specified. to ensure that nitrogen discharge is reduced to or maintained at the level specified in Schedule E or the level authorised by any nitrogen discharge rights if a trading scheme is operative within the</u></p>	
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			<p><u>catchment.</u></p> <p>iv. Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026.</p> <p>...</p> <p>vi. The monitoring, record keeping, reporting and information provision, <u>including public information provision</u>, requirements for the holder of the resource consent to demonstrate and/or monitor compliance with the Farm Environment Plan.</p> <p>vii. The timeframe and circumstances under which the consent conditions may be reviewed of the Farm Environment Plan shall be amended.</p> <p>viii. Procedures for reviewing, amending and re-certifying re-approving the Farm Environment Plan <u>the resource consent including:</u></p> <p><u>a) Periodic reviews in accordance with the sub-catchment progress review timeframes as specified in Table 3.11-2.</u></p> <p><u>b) Reviews, initiated by the consent holder under section 128 on the purchase or sale of any nitrogen discharge rights under any operative catchment nitrogen trading scheme, in order to change the level of discharge authorised by the consent in clause iii.</u></p> <p>Dates:</p> <p>I. For Priority 1 sub-catchments, and properties with a Nitrogen Reference Point of greater than 75th percentile nitrogen leaching values, by 1 July 2020</p> <p>...</p> <p>Notification: Consent applications will be</p>	
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			<p>considered without notification, and without the need to obtain written approval of affected persons.</p> <p><u>Reviews will be subject to limited or public notification based on progress against the sub-catchment progress review targets and timeframes specified in Table 3.11-2."</u>]</p>	
		PC1-11000	<p>Rule 3.11.5.5 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.5 to read: "The use of land for commercial vegetable production 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 until 1 January 2020, from which date it shall be a controlled activity (requiring resource consent) subject to <u>provided</u> the following standards and terms <u>are complied with</u>:</p> <p>...</p> <p>d. The land use is registered to a Certified Industry Scheme; and</p> <p>...</p> <p>h. A Farm Environment Plan for the property or enterprise prepared in conformance with Schedule 1 and approved by a Certified Farm Environment Planner is provided to the Waikato Regional Council at the time <u>as part of</u> the resource consent application is lodged.</p> <p><u>i. Nitrogen discharge from the properties meets the targets and timeframes set out in Schedule E, as assessed by the Regional Council under the methodology contained in Schedule B (including Updated Nitrogen Leaching Assessments).</u></p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p>Matters of Control: Waikato Regional Council reserves control over the following matters:</p> <p>i. The content of the Farm Environment Plans <u>which in any event must be in accordance with Schedule 1.</u></p> <p><u>i1. Buffers, as specified in Schedule D.</u></p> <p>...</p> <p>iv. The actions and timeframes to ensure the diffuse discharge of nitrogen does not increase beyond the property or enterprises <u>Nitrogen Reference Point is reduced to or maintained at a level specified in Schedule E or any operative nitrogen trading scheme.</u></p> <p>...</p> <p>vi. The monitoring, record keeping, reporting and information provision, <u>including public information provision</u>, requirements for the holder of the resource consent to demonstrate and/or monitor compliance with the Farm Environment Plan.</p> <p>...</p> <p>viii. Procedures for reviewing, amending and re-certifying <u>re-approving the Farm Environment Plan the resource consent including:</u></p> <p><u>a) Periodic reviews in accordance with the sub-catchment review timeframes as specified in Table 3.11-2</u></p> <p><u>b) Reviews, initiated by the consent holders under section 128 on the purchase of sale of any nitrogen discharge rights under any operative catchment nitrogen trading scheme, in order to change the level of discharge authorised by this consent in clause iii.</u></p> <p>Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected</p>	
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			<p>persons- <u>Reviews will be subject to limited or public notification based on progress against the sub-catchment review targets and timeframes specified in Table 3.11-2."</u></p>	
		V1PC1-372	<p>Rule 3.11.5.5 Oppose</p> <p>DELETE the proposed amendment to the date in Rule 3.11.5.5 AND PROVIDE sufficient resourcing to ensure implementation of Rule 3.11.5.5 can occur.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1579	<p>Rule 3.11.5.5 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11000, except as modified by their V1 submission: [AMEND Rule 3.11.5.5 to read: "The use of land for commercial vegetable production 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 until 1 January 2020, from which date it shall be a controlled activity (requiring resource consent) subject to</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p><u>provided</u> the following standards and terms <u>are complied with</u>:</p> <p>...</p> <p>d. The land use is registered to a Certified Industry Scheme; and</p> <p>...</p> <p>h. A Farm Environment Plan for the property or enterprise prepared in conformance with Schedule 1 and approved by a Certified Farm Environment Planner is provided to the Waikato Regional Council at the time <u>as part of</u> the resource consent application is lodged.</p> <p>i. <u>Nitrogen discharge from the properties meets the targets and timeframes set out in Schedule E, as assessed by the Regional Council under the methodology contained in Schedule B (including Updated Nitrogen Leaching Assessments).</u></p> <p>Matters of Control: Waikato Regional Council reserves control over the following matters:</p> <p>i. The content of the Farm Environment Plans <u>which in any event must be in accordance with Schedule 1.</u></p> <p>i1. <u>Buffers, as specified in Schedule D.</u></p> <p>...</p> <p>iv. The actions and timeframes to ensure the diffuse discharge of nitrogen does not increase beyond the property or enterprises Nitrogen Reference Point <u>is reduced to or maintained at a level specified in Schedule E or any operative nitrogen trading scheme.</u></p> <p>...</p> <p>vi. The monitoring, record keeping, reporting and information provision, <u>including public information provision</u>, requirements for the holder of the resource consent to demonstrate and/or monitor</p>	
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			<p>compliance with the Farm Environment Plan. ... viii. Procedures for reviewing, amending and re-certifying re-approving the Farm Environment Plan the resource consent including: a) <u>Periodic reviews in accordance with the sub-catchment review timeframes as specified in Table 3.11-2</u> b) <u>Reviews, initiated by the consent holders under section 128 on the purchase of sale of any nitrogen discharge rights under any operative catchment nitrogen trading scheme, in order to change the level of discharge authorised by this consent in clause iii.</u> Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected persons. Reviews will be subject to limited or public <u>notification based on progress against the sub-catchment review targets and timeframes specified in Table 3.11-2.</u>"]</p>	
		PC1-11001	<p>Rule 3.11.5.6 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.6 to read: "<u>3.11.5.6 Restricted-Discretionary Non Complying Activity Rule - The use of land for farming activities</u> Rule 3.11.5.6 Restricted-Discretionary Non Complying Activity Rule - The use of land for farming activities The use of land for farming activities that does not comply with the conditions, standard or terms of Rules 3.11.5.1 to 3.11.5. and the associated diffuse discharge of nitrogen,</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p>phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a restricted discretionary non-complying activity (requiring resource consent).</p> <p>Waikato Regional Council restricts its discretion over <u>will consider</u> the following matters:</p> <p>i. Cumulative <u>Cumulative</u> Effects on water quality of the catchment of the Waikato and Waipa Rivers, <u>including cumulative effects and the extent to which the limits and targets in Schedule E are achieved.</u></p> <p>...</p> <p>Notification: Consent applications will be considered without <u>with</u> limited or public notification, and without the need to obtain written approval of affected persons.</p>	
		V1PC1-1580	<p>Rule 3.11.5.6 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11001, except as modified by their V1 submission: [AMEND Rule 3.11.5.6 to read: "3.11.5.6 Restricted Discretionary Non Complying <u>Restricted Discretionary Non Complying</u> Activity Rule - The use of land for farming activities Rule 3.11.5.6 Restricted Discretionary Non Complying <u>Restricted Discretionary Non Complying</u> Activity Rule - The use of land for farming activities The use of land for farming activities that does not comply with the conditions, standard or terms of Rules 3.11.5.1 to 3.11.5.5 and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p>result in those contaminants entering water is a restricted discretionary non-complying activity (requiring resource consent).</p> <p>Waikato Regional Council restricts its discretion over will consider the following matters:</p> <p>i. <u>Cumulative Effects</u> on water quality of the catchment of the Waikato and Waipā Rivers, <u>including cumulative effects and the extent to which the limits and targets in Schedule E are achieved.</u></p> <p>...</p> <p>Notification: Consent applications will be considered without limited or public notification, and without the need to obtain written approval of affected persons."]</p>	
		PC1-11002	<p>Rule 3.11.5.7 Support the provision with amendments</p> <p>AMEND the notification section of Rule 3.11.5.7 to read: "Notification: Consent applications will be considered without <u>limited or public</u> 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."</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1581	<p>Rule 3.11.5.7 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11002, except as modified by their V1 submission: [AMEND the notification section of Rule 3.11.5.7 to read:</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.

			"Notification: Consent applications will be considered without limited or public 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."]	
		PC1-11021	<p>Schedule B</p> <p>AMEND Schedule B to read: <u>"Schedule B - Nitrogen Reference Point and Updated Leaching Assessments/Te Ā pitianga B - Te tohu ā -hauota</u> A property or enterprise with a cumulative area greater than 20 hectares (or any property or enterprise used for commercial vegetable production) must have a Nitrogen Reference Point calculated as follows. <u>Upon consent review, assessments of leaching may need to be recalculated, and the methodology for the calculation of Updated Leaching Assessments is provided as well:</u> a. The Nitrogen Reference Point <u>or Updated Leaching Assessment</u> must be calculated by a Certified Farm Nutrient Advisor to determine the amount of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point <u>or Updated Leaching Assessment</u> shall be determined through the Rule 3.11.5.7 consent process. b. The Nitrogen Reference Point shall be the highest annual nitrogen leaching loss that occurred during a single year (being 12</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.

			<p>consecutive months) within the reference period specified in clause f), except for commercial vegetable production in which case the Nitrogen Reference Point shall be the average annual nitrogen leaching loss during the reference period. <u>The Updated Leaching Assessment will be the rolling average of all years within a review period.</u></p> <p>c. The Nitrogen Reference Point <u>or Updated Leaching Assessment</u> must be calculated using the current version of the OVERSEER Model (or any other model approved by the Chief Executive of the Waikato Regional Council).</p> <p>d. The Nitrogen Reference Point <u>or Updated Leaching Assessment</u> data shall comprise the electronic output file from the OVERSEER or other approved model...</p> <p>...</p> <p>f. The reference period is the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016. <u>For Updated Leaching Assessments, the period is stated in Table 3.11-2 for that sub-catchment.</u></p> <p>g. The following records (where relevant to the land use undertaken on the property or enterprise) must be retained and provided to Waikato Regional Council <u>at its request as part of the nitrogen leaching assessment:</u></p> <p>...</p> <p><u>h. Where changes to OVERSEER (or another model approved by the Chief Executive) results in a higher nitrogen discharge modelled for the same OVERSEER input file on any particular property or properties, then the consent holder will be required to modify inputs in order to</u></p>	
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			<p><u>continue meet the level stated on the consent based on the new version of the model (or new model) unless and until all consents in the sub-catchment review timeframes as specified in Table 3.11-2.</u></p> <p>Table 1: Data input methodology for ensuring consistency of Nitrogen Reference Point <u>or Updated Leaching Assessment</u> data using the OVERSEER® Model"</p>	
		V1PC1-376	<p>Schedule B Oppose</p> <p>RETAIN the original time-frames in Schedule B(e) where possible. OR AMEND Schedule B(e) to provide an extended timeframe with amendment to the start date, which should be retained as the original start date specified in PPC1.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC11539	<p>Schedule B</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11021, except as modified by their V1 submission: [AMEND Schedule B to read: "Schedule B - Nitrogen Reference Point <u>and Updated Leaching Assessments/Te Ā pitihanga B - Te tohu ā -hauota</u> A property or enterprise with a cumulative area</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p>greater than 20 hectares (or any property or enterprise used for commercial vegetable production) must have a Nitrogen Reference Point calculated as follows. <u>Upon consent review, assessments of leaching may need to be recalculated, and the methodology for the calculation of Updated Leaching Assessments is provided as well:</u></p> <p>a. The Nitrogen Reference Point <u>or Updated Leaching Assessment</u> must be calculated by a Certified Farm Nutrient Advisor to determine the amount of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point <u>or Updated Leaching Assessment</u> shall be determined through the Rule 3.11.5.7 consent process.</p> <p>b. The Nitrogen Reference Point shall be the highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period specified in clause f), except for commercial vegetable production in which case the Nitrogen Reference Point shall be the average annual nitrogen leaching loss during the reference period. <u>The Updated Leaching Assessment will be the rolling average of all years within a review period.</u></p> <p>c. The Nitrogen Reference Point <u>or Updated Leaching Assessment</u> must be calculated using the current version of the OVERSEER Model (or any other model approved by the Chief Executive of the Waikato Regional Council).</p> <p>d. The Nitrogen Reference Point <u>or Updated Leaching Assessment</u> data shall comprise the</p>	
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			<p>electronic output file from the OVERSEER or other approved model...</p> <p>...</p> <p>f. The reference period is the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016. <u>For Updated Leaching Assessments, the period is stated in Table 3.11-2 for that sub-catchment.</u></p> <p>g. The following records (where relevant to the land use undertaken on the property or enterprise) must be retained and provided to Waikato Regional Council at its request as part of the nitrogen leaching assessment:</p> <p>...</p> <p><u>h. Where changes to OVERSEER (or another model approved by the Chief Executive) results in a higher nitrogen discharge modelled for the same OVERSEER input file on any particular property or properties, then the consent holder will be required to modify inputs in order to continue meet the level stated on the consent based on the new version of the model (or new model) unless and until all consents in the sub-catchment are reviewed under the sub-catchment review timeframes as specified in Table 3.11-2.</u></p> <p>Table 1: Data input methodology for ensuring consistency of Nitrogen Reference Point <u>or Updated Leaching Assessment</u> data using the OVERSEER® Model"]</p>	
		PC1-11004	<p>Table 3.11-1 Support the provision with amendments</p> <p>AMEND Table 3.11-1 so that 80-year attributes</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by</p>

			<p>and targets are consistent with ecosystem health measures and achieving healthy freshwater ecosystems</p> <p>AND AMEND the numerical 80-year targets to give effect to the water quality objectives of the Vision and Strategy AND AMEND Table 3.11-1 to include a range of attribute targets for all sites and sub-catchments that provide a clear linkage and assessment and measurement chain from the desired freshwater outcome to required reductions in nutrient loss from land by way of an allocation system</p> <p>AND AMEND to include attribute targets that enable an accurate characterisation of water quality and ecosystem health AND that ensure freshwater resources are sustainably managed, provide for the habitat of trout and indigenous fish and the significant values of wetlands, AND that measure progress toward outcomes and enable reviews to assess the effectiveness of PPC1</p> <p>AND AMEND to include appropriate sites for every sub-catchment</p> <p>AND AMEND to define and refine short-term attribute targets for all sites</p> <p>AND AMEND the explanatory narrative to read: <u>"Actions put in place and implemented by 2036 to reduce discharges of nitrogen, phosphorous, sediment and microbial pathogens, have achieved thirty percent of the required change between current water quality and the 80 year water quality attribute targets in Table 3.11-1 once this Plan has been operative for 20 years."</u></p> <p>AND AMEND to ensure clear linkages between Tables 3.11-1 and Table 3.11-2</p> <p>AND AMEND Table 3.11-1 to adopt the amendments sought for rivers and streams, and</p>	<p>WPL in its own submissions, and seeks that it should be disallowed.</p>
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			add appropriate indicators for lakes and wetlands, as detailed in the table in Appendix 1 of the submission (pages 66 to 69).	
		V1PC1-278	<p>Table 3.11-1 Support with amendments</p> <p>RETAIN Table 3.11-1. AND AMEND to include attributes, limits and targets as set out in Appendix 2 [attached to full submission]. AND ENSURE the amendments are consistent with other relief sought by the submission AND the thresholds listed in Appendix 1 [attached to the submission].</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-282	<p>Table 3.11-1 Support with amendments</p> <p>AMEND Table 3.11-1 to include limits and targets for all sub-catchments encompassed by V1 including those previously without limits or targets. AND AMEND to include a new site at Pungarehu Canal for Waikare sub-catchment.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-287	<p>Table 3.11-1 Support with amendments</p> <p>AMEND Table 3.11-1 to include Dissolved Inorganic Nitrogen, Dissolved Reactive Phosphorous and Periphyton attributes with limits and targets consistent with the swimmable, healthy and food gathering goals of the Vision and Strategy in the Waipā River and tributaries. AND AMEND to ensure that limits and targets for</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent

			<p>trophic state attributes reflect the same desired ecosystem health state for each site.</p>	<p>with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-289	<p>Table 3.11-1 Support with amendments</p> <p>AMEND Table 3.11-1 so that Nitrate is managed for ecosystem health, based on critical concentration thresholds in rivers, instead of toxicity.</p> <p>AND AMEND so that limits and targets for toxicity attributes reflect the same desired ecosystem health state for each site and are consistent across all attributes.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-292	<p>Table 3.11-1 Support with amendments</p> <p>AMEND Table 3.11-1 to include specific attributes, limits and targets to restore and protect the Whangamarino Wetland ecosystem, including sediment and P.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

		V1PC1-293	<p>Table 3.11-1 Support with amendments</p> <p>AMEND Table 3.11-1 to include a clarity target/limit at the Mercer Bridge site. AND AMEND Table 3.11-1 so that clarity short and long term limits and targets are set according to specific values like ecosystem health, swimming and mahinga kai/fishing values. AND AMEND to include a clarity limit/target of 2m for Trout fishing values in the Waikato River main stem. AND AMEND to include a clarity limit/target of 3.75-5m for Trout spawning and significant Trout fisheries.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-299	<p>Table 3.11-1 Support with amendments</p> <p>AMEND Table 3.11-1 to include NEW attributes with numeric limits and targets consistent with the swimmable, healthy and food gathering goals of the Vision and Strategy. AND AMEND to include Nitrate and Dissolved Reactive Phosphorous (DRP) attributes, with limits as set out in Appendix 1 [attached to full submission]. AND AMEND to include Observed/expected Macroinvertebrate Community Index (MCI) (the fraction of current MCI divided by the predicted reference MCI to account for natural spatial variation) with limits as set out in Appendix 1. AND AMEND to include deposited sediment and Periphyton in hard bottomed streams (using a relative measure to account specific characteristics of streams in the catchment).</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			AND ADD an Estuary Trophic Index for the Waikato River Estuary, in the Port Waikato sub-catchment.	
		V1PC1-1583	<p>Table 3.11-1 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11004, except as modified by their V1 submission: [AMEND Table 3.11-1 so that 80-year attributes and targets are consistent with ecosystem health measures and achieving healthy freshwater ecosystems</p> <p>AND AMEND the numerical 80-year targets to give effect to the water quality objectives of the Vision and Strategy AND AMEND Table 3.11-1 to include a range of attribute targets for all sites and sub-catchments that provide a clear linkage and assessment and measurement chain from the desired freshwater outcome to required reductions in nutrient loss from land by way of an allocation system</p> <p>AND AMEND to include attribute targets that enable an accurate characterisation of water quality and ecosystem health AND that ensure freshwater resources are sustainably managed, provide for the habitat of trout and indigenous fish and the significant values of wetlands, AND that measure progress toward outcomes and enable reviews to assess the effectiveness of PPC1</p> <p>AND AMEND to include appropriate sites for every sub-catchment</p> <p>AND AMEND to define and refine short-term attribute targets for all sites</p> <p>AND AMEND the explanatory narrative to read:</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.

			<p>"Actions put in place and implemented by 2036 to reduce discharges of nitrogen, phosphorous, sediment and microbial pathogens, have achieved thirty percent of the required change between current water quality and the 80 year water quality attribute targets in Table 3.11-1 once this Plan has been operative for 20 years." AND AMEND to ensure clear linkages between Tables 3.11-1 and Table 3.11-2 AND AMEND Table 3.11-1 to adopt the amendments sought for rivers and streams, and add appropriate indicators for lakes and wetlands, as detailed in the table in Appendix 1 of the submission (pages 66 to 69).]</p>	
		PC1-11018	<p>Offset definition Support the provision with amendments</p> <p>AMEND Definition - Offset/s to read: "Offset/s: For the purpose of Chapter 3.11 means for a specific contaminant/s a <u>measurable conservation</u> action that reduces <u>the intensity, extent and/or duration of residual adverse effects of that contaminant on water quality</u> <u>and achieves conservation outcomes above and beyond that which would have been achieved if the offset had not taken place.</u>"</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-379	<p>75th percentile nitrogen leaching value definition Oppose with amendments</p> <p>RETAIN the original time-frames in Definition - 75th percentile nitrogen leaching value where possible OR AMEND Definition - 75th percentile</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks</p>

			nitrogen leaching value to be consistent with Schedule B(e).	that it should be disallowed.
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Ballance Agri-Nutrients Ltd	74036	PC1-6567	Objective 1 Support the provision RETAIN Objective 1. AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-6569	Objective 3 Support the provision ADOPT as notified Objective 3. AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-6564	Objective 4	WPL supports and

			<p>Support the provision with amendments</p> <p>AMEND Objective 4 to read: "A staged approach to change enables people and communities to undertake adaptive <u>implement management responses (including those set out in Implementation Methods set out under section 3.11.4)</u> to continue to provide..."</p> <p>AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-6704	<p>Policy 1</p> <p>Support the provision with amendments</p> <p>ADOPT Policy 1 as notified.</p> <p>AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-6864	<p>Policy 6</p> <p>Support the provision with amendments</p> <p>AMEND Policy 6 to read: "Except as provided for... will generally not be granted, <u>where this discharge occurs in an over- allocated catchment</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its</p>

			<p><u>or sub-catchment.</u>"</p> <p>AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.</p>	<p>own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-6878	<p>Policy 7</p> <p>Oppose the provision with amendments</p> <p>AMEND Policy 7 to DELETE the reference to the need for any future allocation to consider the principles set out in (a) to (d) OR AMEND to read: "<u>From 1 July 2026, Any any</u> future allocation should consider..."</p> <p>AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-6908	<p>Method 3.11.4.11</p> <p>Support the provision</p> <p>AMEND Method 3.11.4.11(a) to read: "Review and report on the... objectives of Chapter 3.11, <u>and the applicability of the 80-year timeframe, should the science and the information available advance to the point where it may be possible to achieve the water quality objectives in a shorter timeframe without causing unacceptable social and economic harm:...</u>"</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent</p>

			AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.	with the specific decisions sought by WPL in its own submissions.
		PC1-6901	<p>Rule 3.11.5.2 Oppose the provision</p> <p>AMEND Rule 3.11.5.2(4)(c) to read: "No part of the property or enterprise over 15 degrees slope is cultivated or grazed, <u>except where the property is managed in accordance with Good Management Practices that accord with the practices described in the document entitled 'Industry-agreed Good Management Practices relating to water quality' - dated September 2015; and...</u>"</p> <p>AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-6194	<p>Rule 3.11.5.5 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.5 to make it clear at what point the rule will trigger the need for resource consent.</p> <p>AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

		PC1-6867	<p>Rule 3.11.5.7 Support the provision with amendments</p> <p>DELETE from Rule 3.11.5.7 the non-complying status and REPLACE with a discretionary activity status. AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-6570	<p>Schedule B Support the provision with amendments</p> <p>AMEND Schedule B(e) to have a realistic timeframe beginning 12 months from the date that PPC1 becomes operative. AND DELETE the words 'Certified Farm Nutrient Advisor' and REPLACE with the words: "<u>Certified Nutrient Management Advisor.</u>" AND AMEND to provide guidance on what happens when OVERSEER is updated guided by reference to 'Using Overseer in Regulation' report prepared by Freeman Environmental, dated August 2016. AND AMEND (g)(i) to require monthly stock numbers to be recorded. AND AMEND (f) so that the reference period covers 2012/13 and 2013/14 in conjunction with 2014/15 and 2015/16 with the ability to choose any two years as the reference point. AND that the reference point for commercial vegetable</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p>production is 1 July 2012 to 30 June 2016. AND AMEND Table 1 as follows:</p> <ul style="list-style-type: none"> ▪ Location, Pastoral and horticulture, column two DELETE 'Select Waikato Region' and REPLACE with the words; "<u>Select relevant OVERSEER Region for your farm refer to drop down</u>". ▪ Animal distribution, relative productivity pastoral only; CLARIFY where the non-irrigated 0.75 (75 percent) is taken from. ▪ Block climate data; AMEND to reflect variability in block size and geographical differences. ▪ Soil description; AMEND to provide for the most up to date data (i.e. S-Map data) is utilised and when there is more S-map data then the Overseer soils data be changed to obtain a new reference point. <p>AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.</p>	
		PC1-7105	<p>Schedule 1 Support the provision with amendments</p> <p>AMEND Schedule 1(A)(2)(b)(iii) to read: "<u>The provision of minimum cultivation setbacks of 5 metres, except where the property is managed in accordance with Good Management Practices that accord with the practices described in the document entitled 'Industry-agreed Good Management Practices relating to water quality' - dated September 2015</u>". AND AMEND (A)(2)(f)(d) to read: "maintaining appropriate buffers between cultivated areas and water bodies (minimum 5m setback), except where the</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own</p>

			<p><u>property is managed in accordance with Good Management Practices that accord with the practices described in the document entitled 'Industry-agreed Good Management Practices relating to water quality' - dated September 2015"</u></p> <p>AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.</p>	submissions.
		PC1-7090	<p>Certified Farm Nutrient Advisor definition Support the provision with amendments</p> <p>DELETE the Definition Certified Farm Nutrient Advisor and REPLACE with the words: "<u>Certified Nutrient Management Advisor means a Nutrient Manager Advisor certified under the Nutrient Manager Advisor Certification Programme Ltd</u>".</p> <p>AND MAKE any similar amendments to like effect or any consequential amendments that stem from the relief sought.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
Beef + Lamb New Zealand Ltd	73369	PC1-11150	<p>3.11.2 Objectives Oppose the provision with amendments</p> <p>AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which establish Freshwater Objectives based on the values of freshwater including cultural, recreational, and ecological values, along with consumptive values (ability to assimilate pollution, food production, and forestry).</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent

			<p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which change Table 3.11-1 numerical water quality targets to Freshwater Objectives as appropriate (i.e. chlorophyll a, clarity, E.coli), and remove these parameters from Table 3.11-1 and instead hold as numerical freshwater Objectives.</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required new Objectives which recognise and provide for the establishment and operation of collaborative sub-catchment groups, both through regulatory and non-regulatory methods, in sustainably managing water quality and biodiversity issues facing a catchment, providing innovative and where required edge of field mitigation and which facilitates flexible, viable businesses and communities, and enables sustainable management of resources such as nutrients within the assimilative capacity of soils and water, to achieve the Vision and Strategy for the Waikato River.</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which ensure resource use is efficient including through establishment of nitrogen allocation frameworks if nitrogen is required to be allocated.</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which ensure that resource use takes into account the natural capital of soils including the natural productive potential of soils (for example Land Use Capability), climate, geology, and assimilative capacity of water.</p>	<p>with the specific decisions sought by WPL in its own submissions.</p>
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			<p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which provide for the economic and social wellbeing of people and communities, people and community resilience, adaptive management, and sub-catchment approaches lead by communities.</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which ensure that limits and targets are set appropriately and enable the economic and social well-being of people and communities and ensure that they are resilient, vibrant, and future proofed.</p> <p>AND AMEND PPC1 so that it adopts and truly encourages and empowers a sub-catchment approach to managing land use and water quality, tailored to the specific issues faced by the sub-catchment , and with appropriate time frames for achievement of its interim targets and long term Objectives.</p> <p>AND AMEND PPC1 to provide communities and individuals with certainty in relation to what will be required of them to enable sound business, succession, and investment decisions to be made, including investment into environmental mitigation.</p> <p>AND AMEND Objective 4 OR ADD a NEW Objective to give effect to the following intent: <u>"People and community resilience / Te Whaingā 4: Te manawa piharau o te tangata me te hapori, and the achievement of the Vision and Strategy for the Waikato River.</u> <u>Communities working together to sustainably manage land and water resources within their</u></p>	
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			<p><u>sub-catchments, to protect the values for freshwater, to maintain and where degraded improve water quality, and to protect and restore biodiversity, for generations to come."</u></p> <p>AND AMEND Table 3.11-1 and PPC1 Objectives to make a clear distinction between what are Freshwater Objectives, Attributes, limits and targets. Freshwater Objectives would include values of freshwater such as cultural, ecological, primary production, commercial, and recreational and may include numerical parameters for periphyton, chlorophyll a, macroinvertebrate community indices (MCI) and sediment and clarity.</p>	
		PC1-11154	<p>Objective 1 Oppose the provision with amendments</p> <p>AMEND Objective 1 AND/OR ADD new Objectives to give effect to the following intent: <u>"Objective 1A Water management Values: Surface water bodies are managed in a manner which safe guards their life supporting capacity and recognises and provides for the Values in Section 3.11.1.</u> <u>Objective 1B Targeted and risk based approach to managing land and water resources which is focused on sub- catchments:</u> <u>(ii) water quality is managed to ensure that:</u> <u>(a) water quality is maintained in those rivers and lakes where the existing water quality is at a level sufficient to support the Values in Section 3.11.1 Objective 1A</u> <u>(b) water quality is enhanced in those rivers and lakes where the existing water quality is not at a</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>level sufficient to support the Values in Section 3.11.1 Objective 1A, so that the values are supported by 2097;</u> <u>(c) accelerated eutrophication and sedimentation of lakes in the catchment is prevented or minimised."</u></p>	
		V1PC1-1687	<p>Objective 1 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11154: [AMEND Objective 1 AND/OR ADD new Objectives to give effect to the following intent: <u>"Objective 1A Water management Values: Surface water bodies are managed in a manner which safe guards their life supporting capacity and recognises and provides for the Values in Section 3.11.1.</u> <u>Objective 1B Targeted and risk based approach to managing land and water resources which is focused on sub- catchments:</u> (ii) <u>water quality is managed to ensure that:</u> (a) <u>water quality is maintained in those rivers and lakes where the existing water quality is at a level sufficient to support the Values in Section 3.11.1 Objective 1A</u> (b) <u>water quality is enhanced in those rivers and lakes where the existing water quality is not at a level sufficient to support the Values in Section 3.11.1 Objective 1A, so that the values are supported by 2097;</u> <u>(c) accelerated eutrophication and sedimentation of lakes in the catchment is prevented or minimised."</u>]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-11482	Objective 3	WPL supports and

			<p>Oppose the provision with amendments</p> <p>AMEND Objective 3 so that it provides for and enables management approaches tailored to the sub-catchment unit or waterbody and which specifically focus on the issues identified for that waterbody (i.e. in some catchments it may be Nitrogen but in others it may be sediment). AND DELETE reference to 10 percent of the required change. AND AMEND Table 3.11-1 so that the interim targets and timeframes recognise and provide for the Economic and Social well-being of people and communities including implications for actions, investments, ongoing management changes and any social, cultural or economic implications. AND AMEND Objective 3 by extending timeframes to longer than 10 years, preferably 30 years.</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1660	<p>Objective 3 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11482: [AMEND Objective 3 so that it provides for and enables management approaches tailored to the sub-catchment unit or waterbody and which specifically focus on the issues identified for that waterbody (i.e. in some catchments it may be Nitrogen but in others it may be sediment). AND DELETE reference to 10 percent of the required change. AND AMEND Table 3.11-1 so that the interim targets and timeframes recognise and provide for the Economic and Social well-being of people and communities including implications for actions,</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			investments, ongoing management changes and any social, cultural or economic implications. AND AMEND Objective 3 by extending timeframes to longer than 10 years, preferably 30 years.]	
		PC1-11483	<p>Objective 4 Oppose the provision</p> <p>ADD a NEW Objective to PPC1 which provides for people and community resilience, adaptive management, and sub- catchment approaches led by communities. AND DELETE from Objective 4 reference to the staged approach and future plan changes including increasing stringency in land use controls and requirements AND REPLACE with adaptive management Objectives and Policies. AND AMEND Objective 4 OR ADD a new Objective to PPC1 to give effect to the following intent: "People and community resilience / Te Whaingā 4: Te manawa piharau o te tangata me te hapori, <u>and the achievement of the Vision and Strategy for the Waikato River.</u> <u>Communities working together to sustainably manage land and water resources within their sub-catchments, to protect the values for freshwater, to maintain and where degraded improve water quality, and to protect and restore biodiversity, for generations to come.</u>" AND AMEND Table 3.11-1 interim targets so that they apply at a longer time frame such as 30 years, for those parameters which are significantly over allocated now AND AMEND the interim targets so that they progressively reduce over allocation at a rate and scale which provides</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			for people and community resilience including economic well-being. AND AMEND Table 3.11-1 and Objective 4 so that PPC1 provides a pathway for individuals and communities to work together to achieve the Vision and Strategy over the long term.	
		V1PC1-1651	Objective 4 Oppose APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11483: [ADD a NEW Objective to PPC1 which provides for people and community resilience, adaptive management, and sub-catchment approaches led by communities. AND DELETE from Objective 4 reference to the staged approach and future plan changes including increasing stringency in land use controls and requirements AND REPLACE with adaptive management Objectives and Policies. AND AMEND Objective 4 OR ADD a new Objective to PPC1 to give effect to the following intent: <u>"People and community resilience / Te Whaingā 4: Te manawa piharau o te tangata me te hapori, and the achievement of the Vision and Strategy for the Waikato River.</u> <u>Communities working together to sustainably manage land and water resources within their sub-catchments, to protect the values for freshwater, to maintain and where degraded improve water quality, and to protect and restore biodiversity, for generations to come."</u> AND AMEND Table 3.11-1 interim targets so that they apply at a longer time frame such as 30 years, for those parameters which are	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>significantly over allocated now AND AMEND the interim targets so that they progressively reduce over allocation at a rate and scale which provides for people and community resilience including economic well- being.</p> <p>AND AMEND Table 3.11-1 and Objective 4 so that PPC1 provides a pathway for individuals and communities to work together to achieve the Vision and Strategy over the long term.]</p>	
		PC1-11485	<p>Policy 1 Oppose the provision with amendments</p> <p>AMEND Policy 1 to enable land uses which are less than or equal to 20 hectares, or which are leaching at or less than the 'sustainable level' (Footnote: 'Sustainable level' can be defined as either a kg liveweight per ha relative to land use capability (LUC) or Nitrogen kg discharge rate per hectare (kgN/ha/year) which achieves the desired in-stream Nitrogen load) to continue and provide them with flexibility to change farm systems or stocking rates up to the 'sustainable level'.</p> <p>AND IF Nitrogen is to be allocated through PPC1 THEN AMEND PPC1 through either amending existing Policies (such as Policy 1) and Rules (such as 3.11.5.1 to 3.11.5.7) OR including a new Policy and associated Rules which sets out how Nitrogen will be allocated and discharges managed.</p> <p>AND AMEND to ensure the allocation and management framework for Nitrogen promotes the efficient use of natural resources AND incentivises activities and behaviour change which promote the sustainable management of natural resources AND will achieve the Vision and</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>Strategy AND incorporates the allocation principles set out under appendix 1 in the submission.</p> <p>AND AMEND PPC1 to manage or allocate Nitrogen based on:</p> <p>(a) 'flat rate per hectare' permitted threshold (where the sub-catchment load is divided by the total number of hectares in the sub-catchment and this amount is allocated as a Nitrogen discharge threshold to each hectare of land) for example 20kgN/ha/year; OR</p> <p>(b) Natural capital or land use suitability based allocation per hectare' where a sub-catchment Nitrogen load is attributed to land based on its underlying characteristics and factors (including productive capability using the Land Use Capability classification system). This approach should be used to determine the permitted baseline, and where required to stage reductions in Nitrogen discharges over time as per Table 1 below (footnote: Categories and discharge numbers are indicative only and subject to change through Schedule 1 process as more evidence and data becomes available); AND</p> <p>c) Natural capital or land use suitability based threshold for the discharge of Nitrogen per hectare' that is used to determine where and when Council require additional regulatory standards or stricter activity status to reduce Nitrogen loss over time - based on calculating a sub-catchment Nitrogen load and focusing on priority areas where Nitrogen is over allocated and therefore reductions from land uses are required. For example as set out in Table 1.</p> <p>Table 1 Land Use Capability - Natural Capital</p>	
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			<p>Class I II III IV V VI VII Year 1 (KgN/ha/year) 30 27 24 18 16 15 8 Year 5 (kgN/ha/year) 27 25 21 16 13 12 8</p> <p>AND AMEND Policy 1 and Table 3.11-1 OR ADD a NEW Policy which sets out the:</p> <p>a) Current Nitrogen load (footnote: Current Nitrogen load includes both the Allowable in-stream nitrate load to achieve current in-stream Nitrogen concentration and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land)</p> <p>b) Desired Nitrogen load (footnote: Desired Nitrogen load includes both the Allowable in-stream nitrate load to achieve the desired in-stream Nitrogen concentration, and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land)</p> <p>c) Nitrogen discharge rate/ha/year to achieve current Nitrogen load</p> <p>d) Nitrogen discharge rate/ha/year to achieve the desired Nitrogen load</p> <p>AND AMEND PPC1 so that:</p> <p>f) activities which would cause the maximum catchment load to be exceeded are avoided</p> <p>g) In catchments which are already over allocated, PPC1 should avoid allocating any further Nitrogen</p> <p>h) In catchments which are already over allocated, PPC1 should put in place Methods (such as a 'sinking lid on the allocation') so that over time the over allocation is phased out.</p> <p>AND AMEND PPC1 to ensure that those activities and land uses which are contributing the most to the over allocated parameter bear the majority</p>	
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			of the cost of reducing the over allocation AND AMEND Policy 1 (a) to ensure that low discharging land uses such as small scale (<20kg N/ha) or low impact activities (those discharging at or below the sustainable level) are enabled to continue and are provided with flexibility to change farm systems and stocking rates up to the sustainable levels for the sub-catchment (Freshwater Management Unit).	
		PC1-12575	<p>Policy 1 Oppose the provision with amendments</p> <p>AMEND Policy 1 so that management approaches are tailored to addressing water quality issues identified on a sub- catchment basis, and where the responsibility of addressing the impacts is apportioned to those land uses including point and non-point source discharges which have caused or contributed to any over allocation, and where improvements required over time are appropriate to the level of impact.</p> <p>AND AMEND Policy 1 AND/OR include a new Policy to enable establishment and operation of sub-catchment groups working through global consents to sustainably manage land and water resources, to be innovative, to share and move resources as required within environmental limits, to be flexible, to recognise and provide for biodiversity values, to adopt edge of field mitigation and to offset residual impacts.</p> <p>AND AMEND PPC1 and Policy 1 so that land use rules and management frameworks include both land use and ancillary discharge provisions (sections 9 and 15 Resource Management Act)</p> <p>AND AMEND PPC1 and Policy 1 to enable establishment of nutrient user groups within the</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>same catchment as part of catchment collective groups AND enable transfer of nutrients (at a level not exceeding the desired in-stream nutrient load), where principles in Appendix A of the submission are met, precluding nutrient transfer when allocation is based on current or historic discharges AND transfer within nutrient user groups only occurs: within a sub-catchment or watershed; within an established sub-catchment programme that's based on fair allocation of a load; only pertains to the load which achieves the desired environmental outcome; results in improved economic outcomes and land use optimization.</p> <p>AND AMEND Policy 1 to apply Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and require the application of best practicable option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.</p> <p>AND ADD new Policy 1A OR AMEND Policy 1 to give effect to Objective 1A and 1B with the intent of:</p> <p><u>"Where current water quality meets the relevant Table 3.11 - 1 water quality outcomes (interim targets or 80 year targets/limits) within each sub-catchment, water quality must be managed in a manner which ensures that the water quality targets/ limits continue to be met beyond the zone of reasonable mixing.</u></p> <p><u>Where Table 3.11-1 water quality targets/limits are not met, water quality within the sub-catchment must be managed in a manner which progressively improves existing water quality relevant to the parameter exceeded , in order to</u></p>	
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			<u>meet: (i) The water quality target/limit for the sub-catchment by 2096, and/or (ii) The relevant value that the water quality target/limit is designed to safeguard”</u>	
		PC1-12576	<p>Policy 1 Oppose the provision with amendments</p> <p>AMEND Policy 1 (a) as follows: “enabling activities with a low level of contaminant discharge to water bodies provided those discharges do not increase ”</p> <p>AND AMEND Policy 1 (b) as follows: “Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges; and which exceed the <u>‘sustainable level’ for the sub-catchment (Freshwater Management Unit) to progressively reduce contaminant discharges over time, where the reductions are proportionate to the level of over allocation within the sub-catchment and proportionate to the discharge level of the activity.”</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-12577	<p>Policy 1 Oppose the provision with amendments</p> <p>AMEND Policy 1 (c) as follows: “progressively excluding cattle, horses, deer, and pigs from rivers, stream, drains, wetlands and lakes <u>on land up to 15 degrees slope, and where break fed on land above 15 degrees slope.”</u></p> <p>AND AMEND PPC1 so intensively farmed animals are required to be excluded from all permanently flowing waterbodies, but enable flexibility for low intensity land uses or/and hill country farming AND focus management approaches for hill</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by

			country on critical source management.	WPL in its own submissions.
		V1PC1-1661	<p>Policy 1 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11485: [AMEND Policy 1 to enable land uses which are less than or equal to 20 hectares, or which are leaching at or less than the 'sustainable level' (Footnote: 'Sustainable level' can be defined as either a kg liveweight per ha relative to land use capability (LUC) or Nitrogen kg discharge rate per hectare (kgN/ha/year) which achieves the desired in-stream Nitrogen load) to continue and provide them with flexibility to change farm systems or stocking rates up to the 'sustainable level'. AND IF Nitrogen is to be allocated through PPC1 THEN AMEND PPC1 through either amending existing Policies (such as Policy 1) and Rules (such as 3.11.5.1 to 3.11.5.7) OR including a new Policy and associated Rules which sets out how Nitrogen will be allocated and discharges managed. AND AMEND to ensure the allocation and management framework for Nitrogen promotes the efficient use of natural resources AND incentivises activities and behaviour change which promote the sustainable management of natural resources AND will achieve the Vision and Strategy AND incorporates the allocation principles set out under appendix 1 in the submission. AND AMEND PPC1 to manage or allocate Nitrogen based on: (a) 'flat rate per hectare' permitted threshold</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>(where the sub-catchment load is divided by the total number of hectares in the sub-catchment and this amount is allocated as a Nitrogen discharge threshold to each hectare of land) for example 20kgN/ha/year; OR</p> <p>(b) Natural capital or land use suitability based allocation per hectare' where a sub-catchment Nitrogen load is attributed to land based on its underlying characteristics and factors (including productive capability using the Land Use Capability classification system). This approach should be used to determine the permitted baseline, and where required to stage reductions in Nitrogen discharges over time as per Table 1 below (footnote: Categories and discharge numbers are indicative only and subject to change through Schedule 1 process as more evidence and data becomes available); AND</p> <p>c) Natural capital or land use suitability based threshold for the discharge of Nitrogen per hectare' that is used to determine where and when Council require additional regulatory standards or stricter activity status to reduce Nitrogen loss over time - based on calculating a sub-catchment Nitrogen load and focusing on priority areas where Nitrogen is over allocated and therefore reductions from land uses are required. For example as set out in Table 1.</p> <p>Table 1</p> <table border="1"> <thead> <tr> <th colspan="8">Land Use Capability - Natural Capital</th> </tr> <tr> <th>Class</th> <th>I</th> <th>II</th> <th>III</th> <th>IV</th> <th>V</th> <th>VI</th> <th>VII</th> </tr> </thead> <tbody> <tr> <td>Year 1 (Kg/N/ha/year)</td> <td>30</td> <td>27</td> <td>24</td> <td>18</td> <td>16</td> <td>15</td> <td>8</td> </tr> <tr> <td>Year 5 (kgN/ha/year)</td> <td>27</td> <td>25</td> <td>21</td> <td>16</td> <td>13</td> <td>12</td> <td>8</td> </tr> </tbody> </table> <p>AND AMEND Policy 1 and Table 3.11-1 OR ADD a</p>	Land Use Capability - Natural Capital								Class	I	II	III	IV	V	VI	VII	Year 1 (Kg/N/ha/year)	30	27	24	18	16	15	8	Year 5 (kgN/ha/year)	27	25	21	16	13	12	8	
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			<p>NEW Policy which sets out the:</p> <p>a) Current Nitrogen load (footnote: Current Nitrogen load includes both the Allowable in-stream nitrate load to achieve current in-stream Nitrogen concentration and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land)</p> <p>b) Desired Nitrogen load (footnote: Desired Nitrogen load includes both the Allowable in stream nitrate load to achieve the desired in-stream Nitrogen concentration, and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land)</p> <p>c) Nitrogen discharge rate/ha/year to achieve current Nitrogen load</p> <p>d) Nitrogen discharge rate/ha/year to achieve the desired Nitrogen load</p> <p>AND AMEND PPC1 so that:</p> <p>f) activities which would cause the maximum catchment load to be exceeded are avoided</p> <p>g) In catchments which are already over allocated, PPC1 should avoid allocating any further Nitrogen</p> <p>h) In catchments which are already over allocated, PPC1 should put in place Methods (such as a 'sinking lid on the allocation') so that over time the over allocation is phased out.</p> <p>AND AMEND PPC1 to ensure that those activities and land uses which are contributing the most to the over allocated parameter bear the majority of the cost of reducing the over allocation</p> <p>AND AMEND Policy 1 (a) to ensure that low discharging land uses such as small scale (<20kg N/ha) or low impact activities (those discharging at or below the sustainable level) are enabled to</p>	
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			continue and are provided with flexibility to change farm systems and stocking rates up to the sustainable levels for the sub-catchment (Freshwater Management Unit).]	
		V1PC1-1667	<p>Policy 1 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12575: [AMEND Policy 1 so that management approaches are tailored to addressing water quality issues identified on a sub-catchment basis, and where the responsibility of addressing the impacts is apportioned to those land uses including point and non-point source discharges which have caused or contributed to any over allocation, and where improvements required over time are appropriate to the level of impact. AND AMEND Policy 1 AND/OR include a new Policy to enable establishment and operation of sub-catchment groups working through global consents to sustainably manage land and water resources, to be innovative, to share and move resources as required within environmental limits, to be flexible, to recognise and provide for biodiversity values, to adopt edge of field mitigation and to offset residual impacts. AND AMEND PPC1 and Policy 1 so that land use rules and management frameworks include both land use and ancillary discharge provisions (sections 9 and 15 Resource Management Act) AND AMEND PPC1 and Policy 1 to enable establishment of nutrient user groups within the same catchment as part of catchment collective groups AND enable transfer of nutrients (at a level not exceeding the desired in-stream</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>nutrient load), where principles in Appendix A of the submission are met, precluding nutrient transfer when allocation is based on current or historic discharges AND transfer within nutrient user groups only occurs: within a sub-catchment or watershed; within an established sub-catchment programme that's based on fair allocation of a load; only pertains to the load which achieves the desired environmental outcome; results in improved economic outcomes and land use optimization.</p> <p>AND AMEND Policy 1 to apply Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and require the application of best practicable option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.</p> <p>AND ADD new Policy 1A OR AMEND Policy 1 to give effect to Objective 1A and 1B with the intent of:</p> <p><u>"Where current water quality meets the relevant Table 3.11 - 1 water quality outcomes (interim targets or 80 year targets/limits) within each sub-catchment, water quality must be managed in a manner which ensures that the water quality targets/ limits continue to be met beyond the zone of reasonable mixing.</u></p> <p><u>Where Table 3.11-1 water quality targets/limits are not met, water quality within the sub-catchment must be managed in a manner which progressively improves existing water quality relevant to the parameter exceeded , in order to meet:</u></p> <p><u>(i) The water quality target/limit for the sub-catchment by 2096, and/or</u></p>	
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			(ii) <u>The relevant value that the water quality target/limit is designed to safeguard”]</u>	
		V1PC1-1668	<p>Policy 1 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-12576: [AMEND Policy 1 (a) as follows: “enabling activities with a low level of contaminant discharge to water bodies provided those discharges do not increase ” AND AMEND Policy 1 (b) as follows: “Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges; and which exceed the <u>‘sustainable level’ for the sub-catchment (Freshwater Management Unit) to progressively reduce contaminant discharges over time, where the reductions are proportionate to the level of over allocation within the sub-catchment and proportionate to the discharge level of the activity.”]</u>]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1669	<p>Policy 1 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-12577: [AMEND Policy 1 (c) as follows: “progressively excluding cattle, horses, deer, and pigs from rivers, stream, drains, wetlands and lakes <u>on land up to 15 degrees slope, and where break fed on land above 15 degrees slope.”</u> AND AMEND PPC1 so intensively farmed animals are required to be excluded from all permanently flowing waterbodies, but enable flexibility for low</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by

			intensity land uses or/and hill country farming AND focus management approaches for hill country on critical source management.]	WPL in its own submissions.
		PC1-12709	<p>Policy 2 Support the provision with amendments</p> <p>AMEND Policy 2 to reflect the amendments set out against Policy 1 which relate to the management of Nitrogen discharges and allocation, and which enable flexibility for low discharging land uses.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-12710	<p>Policy 2 Support the provision with amendments</p> <p>AMEND Policy 2(a) as follows: "Taking a tailored, risk based approach to define mitigation actions on the land that will reduce to manage diffuse discharges of Nitrogen, Phosphorus, sediment and microbial pathogens..." AND AMEND Policy 2 and PPC1 to ensure that management approaches for hill country are focused on critical source management with timeframes tailored through Farm Environment Plans.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-12711	Policy 2	WPL supports and

			<p>Oppose the provision with amendments</p> <p>DELETE Policy 2 (d) AND REPLACE with: <u>"where current water quality is over allocated such that the water quality outcome in the sub-catchment, as set out in Table 3.11-1 is not met, require reductions in the contaminant discharge to be proportionate to the amount of the current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment, to provide for the values."</u> AND AMEND Policy 2 to apply Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and require the application of best practicable option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-11488	<p>Policy 4 Support the provision with amendments</p> <p>AMEND Policy 4 so that it enables small scale land uses (<20ha), low intensity, and low discharging land uses to continue, to be flexible in their land use and their discharge of Nitrogen, and stocking rates, and to be established as set out under Policy 1. AND AMEND to introduce permitted thresholds based on the 'sustainable level ' for the sub-catchment or Freshwater Management Unit. The</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific</p>

			<p>'sustainable level' can be based on Nitrogen loss per/kg/ha/year or alternatively kg live weight per ha relative to land use capability. Nitrogen loss rates should be based on either a permitted activity threshold using an equal allocation for a sub-catchment (e.g. 20kgN/ha/year) or Natural Capital based allocation or activity status (e.g. LUC), and relate to sub-catchment or Freshwater Management Unit specific desired in-stream Nitrogen loads.</p> <p>AND DELETE reference to future further reductions in contaminate discharges.</p> <p>AND AMEND to recognise existing biodiversity values on private land and that further establishment and protection of biodiversity is enabled and incentivised (as Policy 17 does).</p>	<p>decisions sought by WPL in its own submissions.</p>
		V1PC1-1672	<p>Policy 4 Support the provision with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11488: [AMEND Policy 4 so that it enables small scale land uses (<20ha), low intensity, and low discharging land uses to continue, to be flexible in their land use and their discharge of Nitrogen, and stocking rates, and to be established as set out under Policy 1.</p> <p>AND AMEND to introduce permitted thresholds based on the 'sustainable level ' for the sub-catchment or Freshwater Management Unit. The 'sustainable level' can be based on Nitrogen loss per/kg/ha/year or alternatively kg live weight per ha relative to land use capability. Nitrogen loss rates should be based on either a permitted activity threshold using an equal allocation for a sub-catchment (e.g. 20kgN/ha/year) or Natural</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>Capital based allocation or activity status (e.g. LUC), and relate to sub-catchment or Freshwater Management Unit specific desired in-stream Nitrogen loads.</p> <p>AND DELETE reference to future further reductions in contaminate discharges.</p> <p>AND AMEND to recognise existing biodiversity values on private land and that further establishment and protection of biodiversity is enabled and incentivised (as Policy 17 does).]</p>	
		PC1-11490	<p>Policy 6 Oppose the provision with amendments</p> <p>AMEND Policy 6 as follows: "Restricting land use change <u>Restriction on intensive land uses and discharges to water...</u>" AND AMEND to enable land use activities including changes in land use where increases in contaminant discharges still enable sub-catchment outcomes for water quality to be met including the values.</p> <p>AND AMEND to enable changes in land use which occur within the sustainable level for the sub-catchment as set out in Policy 1.</p> <p>AND AMEND to take into account the degree to which land use is optimised in relation to the natural capital of soils, and sub-catchment water quality 80 year attributes targets (Table 3.11-1).</p> <p>AND AMEND to provide for increases in Nitrogen discharge where land use change will result in overall improvement in sustainable management and a decrease in soil loss, Phosphorus loss, management of microbial pathogens, and enhancement of biodiversity values.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1662	<p>Policy 6 Oppose with amendments</p>	<p>WPL supports and opposes the</p>

			<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11490: [AMEND Policy 6 as follows: "Restricting land use change <u>Restriction on intensive land uses and discharges to water...</u>" AND AMEND to enable land use activities including changes in land use where increases in contaminant discharges still enable sub-catchment outcomes for water quality to be met including the values. AND AMEND to enable changes in land use which occur within the sustainable level for the sub-catchment as set out in Policy 1. AND AMEND to take into account the degree to which land use is optimised in relation to the natural capital of soils, and sub-catchment water quality 80 year attributes targets (Table 3.11-1). AND AMEND to provide for increases in Nitrogen discharge where land use change will result in overall improvement in sustainable management and a decrease in soil loss, Phosphorus loss, management of microbial pathogens, and enhancement of biodiversity values.]</p>	<p>submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-11491	<p>Policy 7 Support the provision with amendments</p> <p>AMEND Policy 7 to make it a Method. AND AMEND Policy/Method 7 as follows: "Natural Resource Preparing for Allocation in the future Prepare for further diffuse discharge reductions and any future property or enterprise level allocation of diffuse discharges of Nitrogen, Phosphorus, sediment and microbial pathogens that will be required by subsequent regional plans, by implementing the Policies and</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by</p>

			<p>Methods in this chapter. To ensure this occurs, collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'. <u>Work with stakeholders to determine sub-catchment specific allocation of natural resources including the assimilative capacity of freshwater. The allocation approaches should apply;</u></p> <p>Any future allocation should consider the following principles:</p> <ul style="list-style-type: none"> a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes of allocation); and b. Allowance for flexibility of development of Tangata Whenua ancestral land; and c. Minimise social disruption and costs in the transition to the 'land suitability' approach; and d. Future allocation decisions should take advantage of new data and knowledge." <p>AND ADD the allocation principles in Appendix 1 of the submission and those set out in the general Section of the submission.</p> <p>AND ADD new clauses to take into account the degree to which land use is optimised to the natural capital of soils and assimilative capacity of water.</p> <p>AND AMEND to adopt submissions set out in</p>	<p>WPL in its own submissions.</p>
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			relation to the management and allocation of Nitrogen.	
		V1PC1-1674	<p>Policy 7 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11491: [AMEND Policy 7 to make it a Method. AND AMEND Policy/Method 7 as follows: "Natural Resource Preparing for Allocation in the future Prepare for further diffuse discharge reductions and any future property or enterprise level allocation of diffuse discharges of Nitrogen, Phosphorus, sediment and microbial pathogens that will be required by subsequent regional plans, by implementing the Policies and Methods in this chapter. To ensure this occurs, collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'. Work with stakeholders to determine sub-catchment specific allocation of natural resources including the assimilative capacity of freshwater. The allocation approaches should apply; Any future allocation should consider the following principles: a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes of allocation); and</p> <p>b. Allowance for flexibility of development of Tangata Whenua ancestral land; and</p> <p>c. Minimise social disruption and costs in the transition to the 'land suitability' approach; and</p> <p>d. Future allocation decisions should take advantage of new data and knowledge."</p> <p>AND ADD the allocation principles in Appendix 1 of the submission and those set out in the general Section of the submission.</p> <p>AND ADD new clauses to take into account the degree to which land use is optimised to the natural capital of soils and assimilative capacity of water.</p> <p>AND AMEND to adopt submissions set out in relation to the management and allocation of Nitrogen.]</p>	
		PC1-11498	<p>Method 3.11.4.7 Support the provision with amendments</p> <p>AMEND Method 3.11.4.7 to empower an approach to managing nutrient discharges, and in particular Nitrogen discharges at a sub-catchment level, AND in accordance with amendments sort on the Objectives, Policies and Methods contained within the submission.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

		V1PC1-1681	<p>Method 3.11.4.7 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11498: [AMEND Method 3.11.4.7 to empower an approach to managing nutrient discharges, and in particular Nitrogen discharges at a sub-catchment level, AND in accordance with amendments sort on the Objectives, Policies and Methods contained within the submission.]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-11499	<p>Method 3.11.4.8 Support the provision with amendments</p> <p>AMEND Method 3.11.4.8 to introduce thresholds for the management of contaminants and in particular Nitrogen, that meet the changes sought in this submission, AND that are based on better linking sub-catchment contaminant loads to priority actions through resource consents and Farm Environment Plans.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1682	<p>Method 3.11.4.8 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11499:</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points</p>

			[AMEND Method 3.11.4.8 to introduce thresholds for the management of contaminants and in particular Nitrogen, that meet the changes sought in this submission, AND that are based on better linking sub-catchment contaminant loads to priority actions through resource consents and Farm Environment Plans.]	made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-11500	Rules 3.11.5 ADD a NEW discretionary activity Rule for situations where the standards and conditions of Rules 3.11.5.1 to 3.11.5.6 are not met. AND IF Nitrogen is to be allocated through PPC1 THEN AMEND PPC1 through either amending existing Policies (such as Policy 1) and Rules (such as 3.11.5.1 to 3.11.5.7) OR including a new Policy and associated Rules which sets out how Nitrogen will be allocated and discharges managed.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1649	Rules 3.11.5 APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-11500: [ADD a NEW discretionary activity Rule for situations where the standards and conditions of Rules 3.11.5.1 to 3.11.5.6 are not met. AND IF Nitrogen is to be allocated through PPC1 THEN AMEND PPC1 through either amending	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this

			existing Policies (such as Policy 1) and Rules (such as 3.11.5.1 to 3.11.5.7) OR including a new Policy and associated Rules which sets out how Nitrogen will be allocated and discharges managed.]	would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-11502	<p>Rule 3.11.5.2 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.2 to give effect to PPC1 amended Objectives and Policies including Policy 1, Policy 2, and Policy 4 AND enable activities with lower contaminant discharges including nutrient discharges to continue OR to be established. AND AMEND Rule 3.11.5.2 as follows: "The use of land for farming activities (excluding commercial vegetable production) 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 where the property areas is greater than 4.1 hectares, and has more than 6 stock units per hectare or is used for arable cropping, is a permitted activity subject to the following conditions..." AND DELETE Rule 3.11.5.2 (3) (a) to (e). AND DELETE Rule 3.11.5.2 (4) (b) (i). AND AMEND Rule 3.11.5.2 (4) (ii) as follows: "15kgN/ha/year <u>20kgN/ha/year</u>" OR alternatively replace 20kgN/ha/year with the 'sustainable level' calculated in accordance with Policy 1 and Policy 2, OR adopt a permitted threshold for Nitrogen discharge based on land use capability as a proxy for land use suitability. AND DELETE "grazed" from Rule 3.11.5.2 (4) (c).</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>AND AMEND Rule 3.11.5.2 (4) (d) to provide for some winter grazing of crops below a minimum area or with criteria contained within the Rule to reduce risk of loss from critical source areas. AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards and or thresholds. AND DELETE any standards or clauses which hold land uses to historic nutrient discharge levels or stocking rates.</p>	
		V1PC1-1663	<p>Rule 3.11.5.2 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11502: [AMEND Rule 3.11.5.2 to give effect to PPC1 amended Objectives and Policies including Policy 1, Policy 2, and Policy 4 AND enable activities with lower contaminant discharges including nutrient discharges to continue OR to be established. AND AMEND Rule 3.11.5.2 as follows: "The use of land for farming activities (excluding commercial vegetable production) 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 where the property areas is greater than 4.1 hectares, and has more than 6 stock units per hectare or is used for arable cropping, is a permitted activity subject to the following conditions..."</p> <p>AND DELETE Rule 3.11.5.2 (3) (a) to (e). AND DELETE Rule 3.11.5.2 (4) (b) (i). AND AMEND Rule 3.11.5.2 (4) (ii) as follows:</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>"15kgN/ha/year 20kgN/ha/year" OR alternatively replace 20kgN/ha/year with the 'sustainable level' calculated in accordance with Policy 1 and Policy 2, OR adopt a permitted threshold for Nitrogen discharge based on land use capability as a proxy for land use suitability. AND DELETE "grazed" from Rule 3.11.5.2 (4) (c). AND AMEND Rule 3.11.5.2 (4) (d) to provide for some winter grazing of crops below a minimum area or with criteria contained within the Rule to reduce risk of loss from critical source areas. AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards and or thresholds. AND DELETE any standards or clauses which hold land uses to historic nutrient discharge levels or stocking rates.]</p>	
		V1PC1-1718	<p>Rule 3.11.5.2 Support with amendments</p> <p>RETAIN the decisions requested for Rule 3.11.5.2 as set out in the PPC1 submission. AND AMEND to create further flexibility through FEP provisions.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1719	<p>Rule 3.11.5.3 Support with amendments</p>	<p>WPL supports and opposes the submission because it</p>

			<p>RETAIN the decisions requested for Rule 3.11.5.3 as set out in the PPC1 submission. [no submission in PPC1 to Rule 3.11.5.3] AND AMEND to create further flexibility through FEP provisions.</p>	<p>is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-11503	<p>Rule 3.11.5.4 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.4 (1) as follows: "...and properties or enterprises with a Nitrogen Reference Point greater than the 75th <u>50th</u> percentile Nitrogen-leaching value that are also within a sub-catchment which is currently over allocated in relation to Nitrogen (Table 3.11-1 and 3.11-2);</p> <p>AND AMEND to include new standard that by 2096 the activity does not cause or contribute materially to an exceedance of the water quality 80 year targets for its specific sub- catchment as set out in Table 3.11-1.</p> <p>AND AMEND Schedule 1 as set out in this submission.</p> <p>AND AMEND Schedule C as set out in this submission.</p> <p>AND AMEND timeframes for the requirement to complete and register Farm Environment Plans.</p> <p>AND ADD under 'matters of control (ii) reference to the sub-catchment water quality outcomes and sub-catchment specific issues. Reductions of</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>contaminant discharges may not always be required;</p> <p>AND AMEND matter of control clause (iii) as follows: The actions, timeframes and other measures to ensure that the diffuse discharge of Nitrogen from the property or enterprise, as measured by the five year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified does not cause or materially contribute to exceedance of the sub-catchment Nitrogen attributes/targets in Table 3.11-1 by 2096.</p> <p>AND DELETE reference to the 75th percentile in Rule 3.11.5.4 (iv) AND REPLACE with "<u>for catchments which are currently over allocated for Nitrogen, actions , timeframes, and other measures to ensure the diffuse discharge of Nitrogen is reduced over the term of consent proportionate to the level of over allocation and the contribution that activity makes to the over allocation. Over allocation to be phased out by 50 percent by 2047.</u>"</p> <p>AND ADD reference to Nitrogen discharge limit(s) (based on an estimate or band for land use capability or suitability), as set out under Policy 1</p> <p>AND require consideration of Nitrogen discharge reductions through the consent where sub-catchment discharge thresholds are exceeded.</p> <p>AND AMEND to enable land uses to discharge to a series of Nitrogen discharge thresholds based on a sub-catchment assessment of Land use capability, or suitability.</p> <p>AND AMEND to tailor environmental mitigation to critical source identification and management.</p>	
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			<p>AND AMEND to recognise and provide for existing biodiversity values and enhancement of biodiversity values (in accordance with Policy 17).</p> <p>AND AMEND to take into account the degree to which land use is optimised in relation to the natural capital of soils, and sub-catchment water quality 80 year attributes targets (Table 3.11-1).</p> <p>AND AMEND to enable consents to be granted for a term of 35 years.</p> <p>AND AMEND Rule 3.11.5.4 so that it gives effect to amended Policies 1 and 2 and including Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and requires the application of Best Practicable Option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.</p>	
		V1PC1-1664	<p>Rule 3.11.5.4 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11503: [AMEND Rule 3.11.5.4 (1) as follows: "...and properties or enterprises with a Nitrogen Reference Point greater than the 75th <u>50th</u> percentile Nitrogen-leaching value that are also within a sub-catchment which is currently over allocated in relation to Nitrogen (Table 3.11- 1 and 3.11-2)]; AND AMEND to include new standard that by 2096 the activity does not cause or contribute materially to an exceedance of the water quality 80 year targets for its specific sub- catchment as set out in Table 3.11-1.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>AND AMEND Schedule 1 as set out in this submission.</p> <p>AND AMEND Schedule C as set out in this submission.</p> <p>AND AMEND timeframes for the requirement to complete and register Farm Environment Plans.</p> <p>AND ADD under 'matters of control (ii) reference to the sub-catchment water quality outcomes and sub-catchment specific issues. Reductions of contaminant discharges may not always be required;</p> <p>AND AMEND matter of control clause (iii) as follows: The actions, timeframes and other measures to ensure that the diffuse discharge of Nitrogen from the property or enterprise, as measured by the five year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified does not cause or materially contribute to exceedance of the sub-catchment Nitrogen attributes/targets in Table 3.11-1 by 2096.</p> <p>AND DELETE reference to the 75th percentile in Rule 3.11.5.4 (iv) AND REPLACE with "<u>for catchments which are currently over allocated for Nitrogen, actions , timeframes, and other measures to ensure the diffuse discharge of Nitrogen is reduced over the term of consent proportionate to the level of over allocation and the contribution that activity makes to the over allocation. Over allocation to be phased out by 50 percent by 2047.</u>"</p> <p>AND ADD reference to Nitrogen discharge limit(s) (based on an estimate or band for land use capability or suitability), as set out under Policy 1</p>	
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			<p>AND require consideration of Nitrogen discharge reductions through the consent where sub-catchment discharge thresholds are exceeded.</p> <p>AND AMEND to enable land uses to discharge to a series of Nitrogen discharge thresholds based on a sub-catchment assessment of Land use capability, or suitability.</p> <p>AND AMEND to tailor environmental mitigation to critical source identification and management.</p> <p>AND AMEND to recognise and provide for existing biodiversity values and enhancement of biodiversity values (in accordance with Policy 17).</p> <p>AND AMEND to take into account the degree to which land use is optimised in relation to the natural capital of soils, and sub-catchment water quality 80 year attributes targets (Table 3.11-1).</p> <p>AND AMEND to enable consents to be granted for a term of 35 years.</p> <p>AND AMEND Rule 3.11.5.4 so that it gives effect to amended Policies 1 and 2 and including Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and requires the application of Best Practicable Option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.]</p>	
		V1PC1-1720	<p>Rule 3.11.5.4 Support with amendments</p> <p>RETAIN the decisions requested for Rule 3.11.5.4 as set out in the PPC1 submission. AND AMEND to create further flexibility through FEP provisions.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the</p>

				submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1721	<p>Rule 3.11.5.5 Support with amendments</p> <p>RETAIN the decisions requested for Rule 3.11.5.5 as set out in the PPC1 submission. [no submission in PPC1 to Rule 3.11.5.5] AND AMEND to create further flexibility through FEP provisions.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-11504	<p>Rule 3.11.5.6 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.6 to enable and facilitate sub-catchment collective groups and enterprises in sustainably managing land and water resources to achieve the water quality attributes and targets in Table 3.11-1 by 2096. AND AMEND as follows: "Waikato Regional Council restricts its discretion over the following matters: i. Cumulative effects on water quality of the catchment of the Waikato and Waipa Rivers <u>in</u></p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.

			<p><u>the relevant sub-- catchment(s).</u></p> <p>ii. The diffuse discharge of Nitrogen, Phosphorus, sediment and microbial pathogens.</p> <p>iii. The need for and <u>the</u> content of a Farm Environment Plan.</p> <p>iv. The term of the resource consent.</p> <p>v. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent.</p> <p>vi. The time frame and circumstances under which the consent conditions may be reviewed.</p> <p>vii. The matters addressed by Schedules A, B and C.”</p> <p>AND AMEND to add:</p> <p>a. Timing, and rate of reductions in contaminant discharges</p> <p>b. Compliance with Table 3.11-1 interim targets and 80 year water quality targets</p> <p>c. Compliance with any sub-catchment management plan prepared for the relevant sub-catchment</p> <p>d. The adoption of an adaptive management and mitigation planning approach to manage diffuse discharges of Nitrogen, Phosphorus, sediment and microbial pathogens</p> <p>e. Edge of field mitigation, remediation, and biodiversity enhancement (in accordance with Policy 7)</p> <p>f. The time frame and circumstances under which the consent conditions may be reviewed.</p> <p>AND AMEND so that it gives effect to amended Policies 1 and 2 and including Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and requires the application of Best Practicable Option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or</p>	
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			contribute to a freshwater attribute being exceeded, through resource consents.	
		V1PC1-1684	<p>Rule 3.11.5.6 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11504: [AMEND Rule 3.11.5.6 to enable and facilitate sub-catchment collective groups and enterprises in sustainably managing land and water resources to achieve the water quality attributes and targets in Table 3.11-1 by 2096. AND AMEND as follows: "Waikato Regional Council restricts its discretion over the following matters: i. Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers in the relevant sub-- catchment(s). ii. The diffuse discharge of Nitrogen, Phosphorus, sediment and microbial pathogens. iii. The need for and the content of a Farm Environment Plan. iv. The term of the resource consent. v. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent. vi. The time frame and circumstances under which the consent conditions may be reviewed. vii. The matters addressed by Schedules A, B and C." AND AMEND to add: a. Timing, and rate of reductions in contaminant discharges b. Compliance with Table 3.11-1 interim targets and 80 year water quality targets c. Compliance with any sub-catchment</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.

			<p>management plan prepared for the relevant sub-catchment</p> <p>d. The adoption of an adaptive management and mitigation planning approach to manage diffuse discharges of Nitrogen, Phosphorus, sediment and microbial pathogens</p> <p>e. Edge of field mitigation, remediation, and biodiversity enhancement (in accordance with Policy 7)</p> <p>f. The time frame and circumstances under which the consent conditions may be reviewed.</p> <p>AND AMEND so that it gives effect to amended Policies 1 and 2 and including Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and requires the application of Best Practicable Option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.]</p>	
		PC1-11505	<p>Rule 3.11.5.7</p> <p>Support the provision with amendments</p> <p>AMEND Rule 3.11.5.7 so that the Rule does not apply to land use change where it does not exceed the sustainable Nitrogen discharge threshold (or limit) for the sub-catchment, or stocking rates.</p> <p>AND AMEND so that there is the requirement where the change in land use results in discharges in exceedance of the sustainable discharge level, that those discharges have to be reduced overtime, and may not exceed the 50th percentile for that catchment.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1685	Rule 3.11.5.7	WPL opposes the

			<p>Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11505: [AMEND Rule 3.11.5.7 so that the Rule does not apply to land use change where it does not exceed the sustainable Nitrogen discharge threshold (or limit) for the sub-catchment, or stocking rates.</p> <p>AND AMEND so that there is the requirement where the change in land use results in discharges in exceedance of the sustainable discharge level, that those discharges have to be reduced overtime, and may not exceed the 50th percentile for that catchment.]</p>	<p>submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-11506	<p>Schedule B</p> <p>Oppose the provision with amendments</p> <p>AMEND Schedule B so it is consistent with 'Best Practice Data Input Standards' for the OVERSEER Model and reflects actual farm systems and operations.</p> <p>AND DELETE requirement for a Certified Farm Nutrient Advisor AND REPLACE with a Certified Nutrient Management Advisor.</p> <p>AND DELETE Schedule B Table 1 assumptions where they are inconsistent with 'Best Practice Data Input Standards' for Overseer.</p> <p>AND AMEND to ensure that actual stock weights are used and not the assumptions set out under definition of 'stock unit'.</p> <p>AND ADD a requirement for land owners to provide a summary of soil properties, including land use capability classes, to ensure blocks are developed and applied appropriately within Overseer, and in determination of farm</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p>optimisation within natural resource limits. AND AMEND to extend the requirement to provide a Nitrogen Reference Point to align with Priority one, two and three catchment requirements for Farm Environment Plans. AND AMEND Schedule B (f) to apply the Nitrogen Reference Point to the highest of the financial years from 2011-2016.</p>	
		V1PC1-1665	<p>Schedule B Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11506: [AMEND Schedule B so it is consistent with 'Best Practice Data Input Standards' for the OVERSEER Model and reflects actual farm systems and operations. AND DELETE requirement for a Certified Farm Nutrient Advisor AND REPLACE with a Certified Nutrient Management Advisor. AND DELETE Schedule B Table 1 assumptions where they are inconsistent with 'Best Practice Data Input Standards' for Overseer. AND AMEND to ensure that actual stock weights are used and not the assumptions set out under definition of 'stock unit'. AND ADD a requirement for land owners to provide a summary of soil properties, including land use capability classes, to ensure blocks are developed and applied appropriately within Overseer, and in determination of farm optimisation within natural resource limits. AND AMEND to extend the requirement to provide a Nitrogen Reference Point to align with Priority one, two and three catchment requirements for Farm Environment Plans.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			AND AMEND Schedule B (f) to apply the Nitrogen Reference Point to the highest of the financial years from 2011-2016.]	
		V1PC1-1723	<p>Schedule B Support with amendments</p> <p>RETAIN the decisions requested for Schedule B as set out in the PPC1 submission. AND AMEND to create further flexibility through FEP provisions.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-12366	<p>Schedule 1 Support the provision with amendments</p> <p>RETAIN Schedule 1 (d) AND AMEND Schedule 1 (2) (c) to refer to key critical source areas only.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-12367	Schedule 1	WPL supports and

			<p>Support the provision with amendments</p> <p>AMEND Schedule 1 (3) to include spatial mapping requirements from clauses 2 (c) (i), 2 (c) (ii), 2 (c) (iv), 2 (c) (v), 2 (d) (ii), 2 (d) (iv) and 2 (f) (i).</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-12364	<p>Schedule 1</p> <p>Support the provision with amendments</p> <p>AMEND Schedule 1 (2) (ii) as follows: "for areas with a slope exceeding 25 15 degrees and where stream fencing is impracticable, the provision of alternative mitigation measures." AND DELETE Schedule 1 (f) (i). AND AMEND Schedule 1 (f) (ii) to apply irrespective of slope.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-12365	<p>Schedule 1</p> <p>Support the provision with amendments</p> <p>AMEND Schedule 1 (5) (a) to enable flexibility in Nitrogen discharges up to the sustainable Nitrogen discharge level, but where this is</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its</p>

			<p>exceeded Nitrogen discharges shall not exceed the Nitrogen Reference Point. AND AMEND Schedule 1 (5) (b) so that where the Nitrogen Reference Point exceeds the sustainable Nitrogen discharge level, actions, timeframes and other measures are set out and implemented to ensure that Nitrogen discharge is reduced overtime in a manner and to the extent that corresponds with the level of water quality improvement required to achieve the water quality outcomes and which is proportionate to the level of discharge, i.e. those discharging the most will be required to reduce the most (15 percent of total discharge each 10 year period) AND AMEND Schedule 1 to ensure that land use activities are not able to increase Nitrogen discharge beyond either their Nitrogen Reference Point or the sustainable leaching level, whichever is the highest - default to non-complying Rule.</p>	<p>own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-11508	<p>Schedule 1 Support the provision with amendments</p> <p>AMEND Schedule 1 so farmers can identify the specific actions they will need to take through their Farm Environment Plan to address any water quality issues relevant within their sub-catchment. The Council must identify relevant water quality issues within the sub-catchment, as well as the associated mitigations that farmers should consider. This information must be provided to farmers before they are required to develop a Farm Environment Plan. AND DELETE requirement to be certified by a Certified Farm Environment Planner AND REPLACE with industry approved standard or developed in accordance with skills required to</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			support the development of a Council approved Farm Environment Plan. AND AMEND to enable application of 'Best Practicable Option'.	
		V1PC1-1686	<p>Schedule 1 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11508: [AMEND Schedule 1 so farmers can identify the specific actions they will need to take through their Farm Environment Plan to address any water quality issues relevant within their sub-catchment. The Council must identify relevant water quality issues within the sub-catchment, as well as the associated mitigations that farmers should consider. This information must be provided to farmers before they are required to develop a Farm Environment Plan. AND DELETE requirement to be certified by a Certified Farm Environment Planner AND REPLACE with industry approved standard or developed in accordance with skills required to support the development of a Council approved Farm Environment Plan. AND AMEND to enable application of 'Best Practicable Option'.]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1687	<p>Schedule 1 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12364: [AMEND Schedule 1 (2) (ii) as follows: "for areas with a slope exceeding 25 <u>15</u> degrees and where stream fencing is impracticable, the provision of</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the

			alternative mitigation measures.” AND DELETE Schedule 1 (f) (i). AND AMEND Schedule 1 (f) (ii) to apply irrespective of slope.]	submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1688	Schedule 1 Support with amendments APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-12365: [AMEND Schedule 1 (5) (a) to enable flexibility in Nitrogen discharges up to the sustainable Nitrogen discharge level, but where this is exceeded Nitrogen discharges shall not exceed the Nitrogen Reference Point. AND AMEND Schedule 1 (5) (b) so that where the Nitrogen Reference Point exceeds the sustainable Nitrogen discharge level, actions, timeframes and other measures are set out and implemented to ensure that Nitrogen discharge is reduced overtime in a manner and to the extent that corresponds with the level of water quality improvement required to achieve the water quality outcomes and which is proportionate to the level of discharge, i.e. those discharging the most will be required to reduce the most (15 percent of total discharge each 10 year period) AND AMEND Schedule 1 to ensure that land use activities are not able to increase Nitrogen discharge beyond either their Nitrogen Reference Point or the sustainable leaching level, whichever is the highest - default to non-complying Rule.]	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1689	Schedule 1	WPL supports and

			<p>Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12366: [RETAIN Schedule 1 (d) AND AMEND Schedule 1 (2) (c) to refer to key critical source areas only.]</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1690	<p>Schedule 1 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12367: [AMEND Schedule 1 (3) to include spatial mapping requirements from clauses 2 (c) (i), 2 (c) (ii), 2 (c) (iv), 2 (c) (v), 2 (d) (ii), 2 (d) (iv) and 2 (f) (i).]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-11158	<p>Table 3.11-1 Oppose the provision with amendments</p> <p>AMEND Table 3.11-1 so that the numerical outcomes recognise and provide for the values under Section 3.11.1 Objective 1A.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its</p>

			<p>AND AMEND numerical outcomes (limits/targets, including interim targets) at levels which give effect to the National Policy Statement for Freshwater Management (2014) and in particular Policies CA2 and CA3.</p> <p>AND AMEND to consider the provision of economic well-being, including economic opportunities.</p> <p>AND AMEND to provide for water quality below national bottom lines which results from natural processes and/or from the impacts of national and regionally significant infrastructure.</p> <p>AND AMEND to adopt numerical limits that are appropriate to achieving desired outcomes and are applied at appropriate levels of flow that match the values.</p> <p>AND AMEND numerical water quality targets to Freshwater Objectives as appropriate (i.e. chlorophyll a, clarity, E.coli) AND REMOVE these parameters from Table 3.11-1.</p> <p>AND AMEND as follows:</p> <p><u>"E.coli 260/100 ml < 50th percentile applies 1 November to 30 April when the river is below medium flow:</u></p> <p><u>E.coli 550/100 ml < 20th percentile the concentration of E.coli must not exceed 550 per 100 ml year round when flow is at or below the 20th flow exceedance percentile (i.e. not in the top 20 percent of flows)</u></p> <p><u>The visual clarity of the water measured as the horizontal sighting range of a black disc must equal or exceed [Table 3.11-1 numerical parameter given in meters] when the river is at or below medium flow (the 50th flow exceedance percentile)."</u></p> <p>AND AMEND so that the interim targets and timeframes recognise and provide for the</p>	<p>own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p>Economic and Social well-being of people and communities including implications for actions, investments, ongoing management changes and any social, cultural or economic implications.</p> <p>AND AMEND Table 3.11-1 interim targets so that they apply at a longer time frame such as 30 years, for those parameters which are significantly over allocated now AND AMEND the interim targets so that they progressively reduce over allocation at a rate and scale which provides for people and community resilience including economic well- being.</p> <p>AND AMEND Table 3.11-1 so that PPC1 provides a pathway for individuals and communities to work together to achieve the Vision and Strategy over the long term.</p> <p>AND AMEND Policy 1 and Table 3.11-1 OR ADD a NEW Policy which sets out the:</p> <p>a) Current Nitrogen load (footnote: Current Nitrogen load includes both the Allowable in-stream nitrate load to achieve current in-stream Nitrogen concentration and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land)</p> <p>b) Desired Nitrogen load (footnote: Desired Nitrogen load includes both the Allowable in stream nitrate load to achieve the desired in-stream Nitrogen concentration, and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land)</p> <p>c) Nitrogen discharge rate/ha/year to achieve current Nitrogen load</p> <p>d) Nitrogen discharge rate/ha/year to achieve the desired Nitrogen load</p> <p>AND AMEND Table 3.11-1 and PPC1 Objectives</p>	
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			<p>to make a clear distinction between what are Freshwater Objectives, Attributes, limits and targets. Freshwater Objectives would include values of freshwater such as cultural, ecological, primary production, commercial, and recreational and may include numerical parameters for periphyton, chlorophyll a, macroinvertebrate community indices (MCI) and sediment and clarity.</p> <p>AND AMEND Table 3.11-1 to include the allowable instream load and maximum allowable zone load (MAZL) for Nitrogen for all sub-catchments and Freshwater Management Units. Nitrogen loads should be provided which relate to: current instream Nitrogen concentrations and desired instream Nitrogen concentrations. The instream loads should form the basis of an allocation framework for Nitrogen, if allocation frameworks are deemed necessary, to assist with achievement of the Objectives of PPC1.</p> <p>AND AMEND Table 3.11-1 so that numerical parameters provide for the values of freshwater, including safeguarding the life supporting capacity of freshwater, cultural and primary production values, and meet the Objectives of PPC1. In particular, the E.coli and clarity numerical parameters (Freshwater Objectives) are to be amended so that they can take into account flow and background contaminant levels, natural events and regional and nationally significant infrastructure, and are commensurate with the level of pathogenic risk for contact recreation and cultural values. E.coli and clarity numerical parameters (Freshwater Objectives) should not apply during higher flow events (i.e. above 2x the medium flow), or during the flow recession curve, The approach adopted in the</p>	
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			Horizons region is supported (see suggested wording for E.coli and visual clarity above). AND AMEND Table 3.11-1 following implementation of Policy CA2 such that it gives the effect to Policy CA2 (f) (iv) and (v) and Policy CA3 of the National Policy Statement for Freshwater Management 2014.	
		V1PC1-675	<p>Table 3.11-1 Oppose the provision with amendments</p> <p>RETAIN the decision requested as set out in the submission to PPC1 [see submission point 1658]. AND AMEND Table 3.11-1 to make a clear distinction between what are freshwater objectives, attribute, limits and targets. AMEND Table 3.11-1 to include both the allowable in-stream load and maximum allowable zone load for nitrogen for all sub-catchments and Freshwater Management Units. AND AMEND to ensure nitrogen loads are provided which related to the current in-stream nitrogen concentrations and the desired in-stream nitrogen concentrations. AND AMEND to ensure the nitrogen in-stream concentrations are set at levels which provide for the ecological health of freshwater and sustainable management of natural resources. AND AMEND to adopt numerical limits that are appropriate to achieving desired outcomes and are applied at appropriate levels of flow that match the values, rather than levels reflective of 1863. AMEND Table 3.11-1 to include the MCI, nitrogen and phosphorus in-stream concentrations as set out in the table on page 17 and 21 of the submission.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>AND AMEND Table 3.11-1 to ensure the numerical outcomes recognise and provide for the values in 3.11.1 and objectives in 3.11.2.</p> <p>AND AMEND Table 3.11-1 so that numerical parameters provide for the values of freshwater, including safeguarding the life supporting capacity of freshwater, cultural and primary production values, and meet the Objectives of PPC1. In particular, the E.coli and clarity numerical parameters (Freshwater Objectives) are to be amended so that they can take into account flow and background contaminant levels, natural events and regional and nationally significant infrastructure, and are commensurate with the level of pathogenic risk for contact recreation and cultural values. E.coli and clarity numerical parameters (Freshwater Objectives) should not apply during higher flow events (i.e. above 2x the medium flow), or during the flow recession curve, The approach adopted in the Horizons region is supported (see suggested wording for E.coli and visual clarity above).</p> <p>AND AMEND to adopt the approach taken by Horizons Regional Council:</p> <p><u>"E.coli 260/100 ml < 50th percentile applies 1 November to 30 April when the river is below medium flow:</u></p> <p><u>E.coli 550/100 ml < 20th percentile the concentration of E.coli must not exceed 550 per 100 ml year round when flow is at or below the 20th flow exceedance percentile (i.e. not in the top 20 percent of flows)</u></p> <p><u>The visual clarity of the water measured as the horizontal sighting range of a black disc must equal or exceed [Table 3.11-1 numerical parameter given in meters] when the river is at or below medium flow (the 50th flow exceedance</u></p>	
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			<p><u>percentile).</u>"</p> <p>AND AMEND Table 3.11-1 following implementation of Policy CA2 such that it gives the effect to Policy CA2 (f) (iv) and (v) and Policy CA3 of the NPSFM.</p> <p>AND AMEND to set numerical outcomes (limits/targets, including interim targets) at levels which give effect to the NPSFM. In particular Policies CA2 and CA3.</p> <p>AND AMEND to consider the provision of economic well-being, including economic opportunities.</p> <p>AND AMEND to provide for water quality below national bottom lines which results from natural processes and the impacts of nationally and regionally significant infrastructure.</p> <p>AND AMEND Table 3.11-1 numerical water quality targets to freshwater objectives as appropriate (i.e. chlorophyll a, clarity, E. coli) and remove these parameters from Table 3.11-1 and hold as numerical objectives.</p>	
		V1PC1-1658	<p>Table 3.11-1</p> <p>Oppose the provision with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11158: [AMEND Table 3.11-1 so that the numerical outcomes recognise and provide for the values under Section 3.11.1 Objective 1A.</p> <p>AND AMEND numerical outcomes (limits/targets, including interim targets) at levels which give effect to the National Policy Statement for Freshwater Management (2014) and in particular Policies CA2 and CA3.</p> <p>AND AMEND to consider the provision of economic well-being, including economic</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>opportunities.</p> <p>AND AMEND to provide for water quality below national bottom lines which results from natural processes and/or from the impacts of national and regionally significant infrastructure.</p> <p>AND AMEND to adopt numerical limits that are appropriate to achieving desired outcomes and are applied at appropriate levels of flow that match the values.</p> <p>AND AMEND numerical water quality targets to Freshwater Objectives as appropriate (i.e. chlorophyll a, clarity, E.coli) AND REMOVE these parameters from Table 3.11-1.</p> <p>AND AMEND as follows:</p> <p><u>"E.coli 260/100 ml < 50th percentile applies 1 November to 30 April when the river is below medium flow:</u></p> <p><u>E.coli 550/100 ml < 20th percentile the concentration of E.coli must not exceed 550 per 100 ml year round when flow is at or below the 20th flow exceedance percentile (i.e. not in the top 20 percent of flows)</u></p> <p><u>The visual clarity of the water measured as the horizontal sighting range of a black disc must equal or exceed [Table 3.11-1 numerical parameter given in meters] when the river is at or below medium flow (the 50th flow exceedance percentile)."</u></p> <p>AND AMEND so that the interim targets and timeframes recognise and provide for the Economic and Social well-being of people and communities including implications for actions, investments, ongoing management changes and any social, cultural or economic implications.</p> <p>AND AMEND Table 3.11-1 interim targets so that they apply at a longer time frame such as 30 years, for those parameters which are</p>	
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			<p>significantly over allocated now AND AMEND the interim targets so that they progressively reduce over allocation at a rate and scale which provides for people and community resilience including economic well- being.</p> <p>AND AMEND Table 3.11-1 so that PPC1 provides a pathway for individuals and communities to work together to achieve the Vision and Strategy over the long term.</p> <p>AND AMEND Policy 1 and Table 3.11-1 OR ADD a NEW Policy which sets out the:</p> <p>a) Current Nitrogen load (footnote: Current Nitrogen load includes both the Allowable in-stream nitrate load to achieve current in-stream Nitrogen concentration and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land)</p> <p>b) Desired Nitrogen load (footnote: Desired Nitrogen load includes both the Allowable in stream nitrate load to achieve the desired in-stream Nitrogen concentration, and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land)</p> <p>c) Nitrogen discharge rate/ha/year to achieve current Nitrogen load</p> <p>d) Nitrogen discharge rate/ha/year to achieve the desired Nitrogen load</p> <p>AND AMEND Table 3.11-1 and PPC1 Objectives to make a clear distinction between what are Freshwater Objectives, Attributes, limits and targets. Freshwater Objectives would include values of freshwater such as cultural, ecological, primary production, commercial, and recreational and may include numerical parameters for periphyton, chlorophyll a, macroinvertebrate</p>	
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			<p>community indices (MCI) and sediment and clarity.</p> <p>AND AMEND Table 3.11-1 to include the allowable instream load and maximum allowable zone load (MAZL) for Nitrogen for all sub-catchments and Freshwater Management Units. Nitrogen loads should be provided which relate to: current instream Nitrogen concentrations and desired instream Nitrogen concentrations. The instream loads should form the basis of an allocation framework for Nitrogen, if allocation frameworks are deemed necessary, to assist with achievement of the Objectives of PPC1.</p> <p>AND AMEND Table 3.11-1 so that numerical parameters provide for the values of freshwater, including safeguarding the life supporting capacity of freshwater, cultural and primary production values, and meet the Objectives of PPC1. In particular, the E.coli and clarity numerical parameters (Freshwater Objectives) are to be amended so that they can take into account flow and background contaminant levels, natural events and regional and nationally significant infrastructure, and are commensurate with the level of pathogenic risk for contact recreation and cultural values. E.coli and clarity numerical parameters (Freshwater Objectives) should not apply during higher flow events (i.e. above 2x the medium flow), or during the flow recession curve, The approach adopted in the Horizons region is supported (see suggested wording for E.coli and visual clarity above).</p> <p>AND AMEND Table 3.11-1 following implementation of Policy CA2 such that it gives the effect to Policy CA2 (f) (iv) and (v) and Policy CA3 of the National Policy Statement for Freshwater Management 2014.]</p>	
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		PC1-11510	<p>Glossary of Terms</p> <p>ADD a NEW definition for 'Nutrient user groups' - a group of properties in multiple ownership, where the owners of those properties undertake farming activities and operate as a collective for the purposes of nutrient management. AND ADD a NEW definition for 'Critical Source Area' - a landscape feature like a gully, swale or a depression that accumulates runoff from an adjacent immediate area, and delivers it to surface waterways such as rivers and lakes, artificial waterways and field tiles; and areas which arise through land use activities and management approaches such as cultivation and winter grazing which result in contaminants being discharged from the activity and being delivered to surface waterways.</p> <p>AND ADD a NEW definition for 'Best Practicable Option - Best Practicable option in relation to a discharge of a contaminant which may enter water, means the best Methods for preventing or minimising the adverse effects on the environment having regard, among other things, to -</p> <ul style="list-style-type: none"> (a) the nature of the discharge or emission and the sensitivity of the receiving environment to adverse effects; and (b) the financial implications, and the effects on the environment, of that option when compared with other options; and (c) the current state of technical knowledge and the likelihood that the option can be successfully applied. <p>AND ADD a NEW definition for 'In stream nitrate concentration limits (mg/L)' - the in-stream</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p>water quality concentrations required to achieve the identified water management Objective for the associated sub-catchment or Freshwater Management Unit.</p> <p>AND ADD a NEW definition for 'Allowable in stream nitrate load (tonnes per year)' - the allowable volume of nitrate- Nitrogen that can pass down the river at a particular point as determined from the in-stream nitrate-Nitrogen concentration limit.</p> <p>AND ADD a NEW definition for 'Maximum allowable zone load (MAZL)' - the amount of Nitrogen that can be lost below the root zone within a defined water management zone as determined by the in-stream nitrate load limit (adjusted for attenuation between the root zone and the river)</p> <p>AND ADD a NEW definition for 'Measured in-stream nitrate load (tonnes per year) - the amount of nitrate-Nitrogen measured (based on actual monitoring data) as passing down the river at a particular point.</p>	
		V1PC1-1650	<p>Glossary of Terms</p> <p>APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-11510:</p> <p>[ADD a NEW definition for 'Nutrient user groups' - a group of properties in multiple ownership, where the owners of those properties undertake farming activities and operate as a collective for the purposes of nutrient management. AND ADD a NEW definition for 'Critical Source Area' - a landscape feature like a gully, swale or a depression that accumulates runoff from an adjacent immediate area, and delivers it to</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own</p>

			<p>surface waterways such as rivers and lakes, artificial waterways and field tiles; and areas which arise through land use activities and management approaches such as cultivation and winter grazing which result in contaminants being discharged from the activity and being delivered to surface waterways.</p> <p>AND ADD a NEW definition for 'Best Practicable Option - Best Practicable option in relation to a discharge of a contaminant which may enter water, means the best Methods for preventing or minimising the adverse effects on the environment having regard, among other things, to -</p> <p>(a) the nature of the discharge or emission and the sensitivity of the receiving environment to adverse effects; and</p> <p>(b) the financial implications, and the effects on the environment, of that option when compared with other options; and</p> <p>(c) the current state of technical knowledge and the likelihood that the option can be successfully applied.</p> <p>AND ADD a NEW definition for 'In stream nitrate concentration limits (mg/L)' - the in-stream water quality concentrations required to achieve the identified water management Objective for the associated sub-catchment or Freshwater Management Unit.</p> <p>AND ADD a NEW definition for 'Allowable in stream nitrate load (tonnes per year)' - the allowable volume of nitrate- Nitrogen that can pass down the river at a particular point as determined from the in-stream nitrate-Nitrogen concentration limit.</p> <p>AND ADD a NEW definition for 'Maximum allowable zone load (MAZL)' - the amount of</p>	<p>submissions.</p>
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			<p>Nitrogen that can be lost below the root zone within a defined water management zone as determined by the in-stream nitrate load limit (adjusted for attenuation between the root zone and the river)</p> <p>AND ADD a NEW definition for 'Measured in-stream nitrate load (tonnes per year) - the amount of nitrate-Nitrogen measured (based on actual monitoring data) as passing down the river at a particular point.]</p>	
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CNI Iwi Land Management Ltd	74026	PC1-10771	<p>Objective 1 Support the provision with amendments</p> <p>RETAIN the 80 year timeframe (2096) for achieving Te Ture Whaimana. AND AMEND Objective 1 to read: "By 2096 <u>at the latest</u> discharges of nitrogen..."</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10773	<p>Objective 3 Support the provision</p> <p>RETAIN Objective 3 as currently worded.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

		PC1-10774	Objective 4 Support the provision RETAIN Objective 4 as currently worded.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10776	Policy 1 Support the provision with amendments AMEND Policy 1 to read: "Manage and require reductions in sub-catchment wide discharges of nitrogen, phosphorus, sediment and microbial pathogens, by: a. Enabling activities with a low level of contaminant discharge to water bodies provided these discharges do not increase; provided	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10779	Policy 4 Support the provision RETAIN Policy 4 as currently worded.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10781	Policy 6 Oppose the provision	WPL opposes the submission because it is not consistent with

			DELETE Policy 6.	the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10782	<p>Policy 7 Oppose the provision with amendments</p> <p>DELETE Policy 7 and REPLACE with: <u>"Collect information and undertake research about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and research the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'.</u> <u>Any future regulation should consider the following principles:</u> <u>a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes of allocation);</u> <u>b. Future regulation decisions should take advantage of new data and knowledge."</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10793	<p>Method 3.11.4.7 Support the provision with amendments</p> <p>AMEND Method 3.11.4.7 to read: "Gather information and commission appropriate scientific research to inform any future regulations to manage discharges to target high</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and

			polluting activities framework for the allocation of diffuse discharges by 2026 including: "	seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10794	Method 3.11.4.8 Oppose the provision AMEND Method 3.11.4.8 to read: "Waikato Regional Council will <u>use</u> : a. Develop discharge allocation frameworks for individual properties and enterprises based on information collected under Method 3.11.4.7, taking into account the best available data, knowledge and technology at the time; and b. Use this on Information collected under Method 3.11.4.7 to inform future changes to the Waikato Regional Plan to manage discharges of nitrogen, phosphorus, sediment and microbial pathogens at a property or enterprise-level to meet the targets^ in the Objectives."	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10798	Rule 3.11.5.2 Support the provision with amendments AMEND Rule 3.11.5.2 to read: "Rule 3.11.5.1 - Permitted Activity Rule – Small and Low Intensity farming activities The use of land for farming activities (excluding commercial vegetable production) and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent

			<p>result in those contaminants entering water is a permitted activity subject to the following conditions:</p> <ol style="list-style-type: none"> 1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and 2. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and <p><u>The Property complies with the region-wide Good Management Practices for pastoral land use; and"</u></p>	<p>with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10799	<p>Rule 3.11.5.3 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.3 to read: "...3. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and <u>The Property complies with the region-wide Good Management Practices for pastoral land use; and.."</u></p> <p>AND AMEND PPC1 to ensure Waikato Regional Council retains the ability to review and revoke certification of the Industry Scheme where performance outcomes are not achieved. AND AMEND PPC1 to ensure Waikato Regional Council notifies all applications for Certified Industry Schemes and makes available copies of all audit and monitoring reports received from Certified Industry Schemes.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10800	<p>Rule 3.11.5.4 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.4 to read:</p>	<p>WPL supports and opposes the submission because it is generally consistent</p>

			<p>"Rule 3.11.5.4 - Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme Except as provided for ... is a permitted activity until:</p> <p>1. 1 January 2020 for properties or enterprises in Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</p> <p>2. 1 January 2023 for properties or enterprises in Priority 2 sub-catchments listed in Table 3.11-2;</p> <p>3. 1 January 2026 for properties or enterprises in Priority 3 sub-catchments listed in Table 3.11-2; <u>provided the property or enterprise complies with the region-wide GMPs for pastoral land use;...</u></p> <p>Matters of Control Waikato Regional Council reserves control over the following matters:</p> <p>....</p> <p>ii. The actions and timeframes for undertaking mitigation actions <u>identified in the Farm Environment Plan</u> that will maintain identified low levels of, or reduce the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens to water or to land where they may enter water."</p>	<p>with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10801	<p>Rule 3.11.5.6 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.6 as appropriate to require Good Management Practices.</p>	<p>WPL supports the submission because it is generally consistent with the decisions sought by WPL, and seeks that it should be allowed.</p>
		PC1-10802	<p>Rule 3.11.5.7</p>	<p>WPL opposes the</p>

			<p>Oppose the provision</p> <p>DELETE Rule 3.11.5.7. IF Rule 3.11.5.7 is not deleted, RETAIN the expiry date.</p>	<p>submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-10804	<p>Schedule B</p> <p>Oppose the provision with amendments</p> <p>AMEND Schedule B to read: "....as follows: a. The Nitrogen Reference Point must be calculated by a Certified Farm Nutrient Advisor to determine <u>identify</u> the <u>probable</u> amount of nitrogen being leached from the property or enterprise during the relevant reference period specified.... b. The Nitrogen Reference Point shall be the <u>average nitrogen leaching loss that occurred during the reference period</u> highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period... d. The Nitrogen Reference Point data shall comprise the electronic output file from the OVERSEER® or other approved model. <u>Any use of OVERSEER must follow current best practice guidance for use of OVERSEER and identify all instances where this has been deviated from and why and where the OVERSEER ® Model is used, it must be calculated using the OVERSEER ® Best Practice Data Input Standards 2016, with the exceptions and inclusions set out in Schedule B Table 1.</u>"</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

		PC1-10807	<p>Schedule 1 Support the provision with amendments</p> <p>AMEND Schedule 1 to read: "A. Farm Environment Plans shall contain as a minimum: (e) A description of nutrient management practices including: i. a nutrient budget for the farm enterprise calculated using the model OVERSEER® in accordance with the OVERSEER® use protocols, or using any other model or method approved by the Chief Executive Officer of Waikato Regional Council; <u>and</u> ii. <u>an assessment of the assumptions used in a nutrient budget for the property and an opinion on material differences</u>"</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10772	<p>Table 3.11-1 Oppose the provision with amendments</p> <p>AMEND 80 year numerical attribute targets for nitrogen so that they are expressed as a single set of Total Nitrogen numerical attribute targets measured in the main stem of the Waikato River at the bottom of each Freshwater Management Unit. AND AMEND the 10 year numerical nitrogen attribute targets to show greater consistency between sub-catchment load, recognising that the degree of reduction required is proportionate to the amount of current discharge (those discharging more nitrogen are expected to make greater reductions). AND AMEND Table 3.11-1 for all the nitrogen targets to: 1. REMOVE the 80 year numerical nitrogen</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>attribute targets for from each sub-catchment; and</p> <p>2. Ensure that the 10-year numerical nitrogen attribute targets reflect a reduction framework based on necessary reductions, not on a reaction to current loads.</p> <p>AND AMEND Table 3.11-1 in respect of E.coli and Chlorophyll a to:</p> <p>1. ADD 80 year numerical attribute targets for E.coli and water clarity for the Waikato River main stem and sub- catchments; and</p> <p>2. ADD 80 year numerical attribute targets for Chlorophyll a for the Waikato River main stem; AND AMEND Table 3.11-1 for Total Nitrogen and Total Phosphorus to retain the 10 year Total Nitrogen and Total Phosphorus numerical attribute targets for the Waikato River main stem.</p> <p>AND AMEND the 80 year Total Nitrogen and Total Phosphorus numerical attribute targets to a single point at the bottom of each Freshwater Management Unit.</p>	
D				
DairyNZ	74050	PC1-10168	<p>Objective 3 Support the provision with amendments</p> <p>AMEND Objective 3 to read: "Objective 3: <u>Ten percent Short-term</u> improvements in water quality as the first stage of <u>achieving Objective 1 restoration and protection of water quality for each sub-catchment and Freshwater Management Unit</u>...Actions put in place and implemented by 2026... of the required change between current water quality in 2016, and the 80-year.... the short term water quality attribute^ targets^ <u>for each monitoring site</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by</p>

			<p><u>listed</u> in Table 3.11-1." AND AMEND Objective 3 to clarify that Table 3.11-1 is a list of existing water quality monitoring sites.</p>	<p>WPL in its own submissions.</p>
		PC1-10193	<p>Objective 4 Support the provision with amendments</p> <p>AMEND Objective 4 to read: "Objective 4: People and community resilience/... A staged approach to change enables people and communities to undertake adaptive management to continue to provide for their social, and cultural well-being <u>and assist community resilience</u>, while:..."</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-12592	<p>Policy 1 Support the provision with amendments</p> <p>AMEND Policy 1 to read: <u>"... d. Analysing and reporting the effects of mitigation actions to demonstrate Objective 3 is achieved and acknowledging time lags in the water and on the land."</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

		PC1-10196	<p>Policy 1 Support the provision with amendments</p> <p>AMEND Policy 1 to read: "Policy 1: Manage diffuse <u>and point source</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens/ Te Kaupapa... a. Enabling activities with a low level <u>or a managed low risk</u> of contaminant discharge to water bodies provided those discharges do not increase; and b. Requiring farming activities <u>to be managed through a tailored, risk-based approach, including;</u> i. <u>each farm and enterprise and demonstrating achievement of industry-agreed good management practice, and;</u> ii. <u>pastoral farms with moderate to high levels of nitrogen leaching over a specified amount contaminant discharge to water bodies, or for to reduce their nitrogen discharges; and...</u> c. Progressively excluding cattle, horses, deer, pigs from rivers, streams, drains, wetlands and lakes; <u>and"</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10230	<p>Policy 6 Support the provision with amendments</p> <p>AMEND Policy 6 to read: "Policy 6: Restricting land use change/ Te kaupapa... Except as provided for in Policy 16, 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</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p>demonstrate clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally be granted.</p> <p><u>Land use changes will generally be approved, where the mitigations proposed in the Farm Environment Plan;</u></p> <p><u>a. do not increase the discharges of phosphorus, sediment and microbial contaminants, and</u></p> <p><u>b. can demonstrate there will be no increase in the nitrogen reference point."</u></p>	
		PC1-10229	<p>Policy 7 Support the provision with amendments</p> <p>RETAIN provisions of PPC1 that are focused on information and processes needed for plan reviews AND AMEND to ensure there is a focus on the course of action to fill information gaps before the review of PPC1.</p> <p>AND AMEND Policy 7 to read: "Identify and fill information gaps to Pprepare for further diffuse discharge reductions and any future property or enterprise-level allocation <u>limits of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will may be required by subsequent regional plans, by implementing the policies and methods in this chapter. To ensure this occurs, research will be undertaken in partnership with technical and industry organisations, in a manner that allows people and communities to understand the social, environmental, cultural and economic implications of the current plan, and engage in debate about any future limits. collect information and undertake research to support this, including collecting information about</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'"</p> <p>AND DELETE Policy 7 (a – d).</p>	
		PC1-10240	<p>Method 3.11.4.7 Support the provision with amendments</p> <p>AMEND Method 3.11.4.7 to read: "3.11.4.7 Information requirements to determine the need for <u>property-level limits on diffuse discharges and any future allocation/...</u> <u>Waikato Regional Council will take a broad-based and integrated approach to assessing existing information and new information gathered through PPC1. It will do this in partnership with other agencies and industries, commissioning research on the effects of property-level limits on waterbodies, and implications for individuals and communities, Gather information and commission appropriate scientific research to inform any future framework for the allocation of diffuse discharges</u> including: a. Implementing processes that will support the setting of property or enterprise-level diffuse discharge limits in the future. b. Researching: i. The quantum of contaminants that can be discharged... ... iv. <u>Spatial variability in how land use and mitigations, and the effect of impounded water in hydro-dams affect water quality at a variety of</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<u>scales, to analyse where mitigations can be put in place for the least cost to the regional community."</u>	
		PC1-10241	<p>Method 3.11.4.8 Support the provision with amendments</p> <p>AMEND Method 3.11.4.8 to read: "3.11.4.8 Reviewing Chapter 3.11 and developing <u>options</u> an allocation framework for the next Regional Plan/..." AND AMEND 8a. to read: "Waikato Regional Council will: a. Develop <u>options to reduce</u> discharges allocation frameworks for <u>from</u> individual properties and..."</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10243	<p>Method 3.11.4.11 Support the provision with amendments</p> <p>AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Accounting system and monitoring – Land activities that affect water</u> Monitoring and evaluation of the implementation of Chapter 3.11/... Waikato Regional Council will: a. Review and report on the progress towards and achievement of the 80-year water quality objectives of Chapter 3.11. <u>a.i Set up a monitoring and accounting system for diffuse discharges that documents current contaminant loads of nitrogen, phosphorus, sediment and microbial pathogens, and expected future loads after mitigation actions are put in</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p><u>place and implemented.</u></p> <p>b. Research, and identify <u>and implement methods a programme of work to assess</u> measure actions at a sub-catchment, property and enterprise level, and for their contribution to reductions in the discharge of contaminants...</p> <p>c. ...</p> <p>d. ...</p> <p>e. <u>Prepare for plan reviews by working in partnership with industry to achieve a-d above, in order to gain an accurate assessment of all sources that contribute to contaminant loads from the land, and track changes in diffuse and point source discharges at the scale of individual landowners and businesses, and</u> collate information on the functioning and success of any Certified Industry Scheme."</p>	
		V1PC1-718	<p>Rule 3.11.5.2 Support</p> <p>RETAIN the proposed date change to 30 November 2020 - Rule 3.11.5.2.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-10246	<p>Rule 3.11.5.3 Support the provision</p> <p>RETAIN Rule 3.11.5.3.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		V1PC1-719	<p>Rule 3.11.5.3</p>	<p>WPL opposes the</p>

			Support RETAIN the Priority 1 and Priority 2 date extension - Rule 3.11.5.3.	submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10245	Rule 3.11.5.4 Support the provision RETAIN Rule 3.11.5.4, in particular clause iii.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-721	Rule 3.11.5.4 Support RETAIN the proposed date changes to 3.11.5.4(1) and 3.11.5.4(2).	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-722	Rule 3.11.5.4 Support RETAIN Rule 3.11.5.4(1) and 3.11.5.4(2) dates.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10247	Rule 3.11.5.7 Support the provision with amendments	WPL opposes the submission because it

			ADD an advice note to Rule 3.11.5.7 to read: <u>"Advice note: Changes in land use described above where the resulting land use will not increase diffuse discharges of contaminant, (including that they do not exceed the property or enterprise's Nitrogen Reference Point), will generally be granted. This will be able to be established at the time that the farm or enterprise has completed a Farm Environment Plan and are managing within their Nitrogen Reference Point."</u>	is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10254	Schedule B Support the provision with amendments AMEND Schedule B clauses c and d to read: "...c. The Nitrogen Reference Point must be calculated using the current <u>most recent version</u> of the OVERSEER® Model... d. The nitrogen Reference Point data... with the exceptions and inclusions set out in Schedule B Table 1. <u>When a new version of OVERSEER is issued, the Nitrogen Reference Point may be re-calculated using the latest version of that model. This recalculation should use the same data input file as was used to calculate the first Nitrogen Reference Point in clause a).</u> "	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-714	Schedule B Support with amendments RETAIN the Schedule B closing date of 30 November 2020 for provision of NRP to the Council AND AMEND the start date of May 2020 for provision of NRP to the Council back to 1	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the

			December 2019 OR any date after the next major release of the OVERSEER Model (expected late 2019).	submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-12391	<p>Schedule 1 Support the provision with amendments</p> <p>Schedule 1 - CLARIFY that the Farm Environment Plan allows alternative mitigations where it can be shown that these alternative mitigations achieve at least the same reduction of contaminants entering the water bodies as any standard provided for in PPC1.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-101255	<p>Schedule 1 Support the provision with amendments</p> <p>AMEND Schedule 1 paragraph 2 to read: "The Farm Environment Plan shall identify all <u>critical source areas</u> sources of sediment, nitrogen, phosphorus..." AND AMEND Schedule 2 (b. iii) by altering the provision to focus on managing critical source areas. AND AMEND to ensure that a 5m cultivation setback from water bodies in low risk areas is not necessary if critical source areas have been identified and mitigations put in place.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by

				WPL in its own submissions.
		PC1-10188	<p>Table 3.11-1 Support the provision with amendments</p> <p>AMEND the 4th paragraph of the explanation of Table 3.11-1 (page 56) to read: "The achievement of the attribute targets in Table 3.11-1 will be determined through analysis of 5-yearly monitoring data. <u>Table 3.11-1 lists existing water quality monitoring sites. There is a monitoring site within each sub-catchment. However, the site does not necessarily represent all the surface water flowing from that sub-catchment, as monitoring sites are not all at the downstream confluence of the tributary and the main stem of the Waikato or Waipa River.</u> The variability in water... in the short term. <u>Therefore, Waikato Regional Council will rely on collating and reporting actions put in place, as set out in Policy 1(d), and Methods 3.11.4.10 and 11.</u>"</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10253	<p>75th percentile nitrogen leaching definition Support the provision with amendments</p> <p>AMEND the definition of the 75th percentile nitrogen leaching value to read: "The 75th percentile value... by march 2019, <u>as determined by the Chief Executive of the Waikato Regional Council and published on the Waikato Regional Council website on or before 30 June 2019.</u>"</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by

				WPL in its own submissions.
		V1PC1-716	75 th percentile nitrogen leaching definition Support with amendments RETAIN proposed date change to 30 November 2020 - Definition - 75th percentile nitrogen leaching value.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10251	Certified Farm Nutrient Advisor definition Oppose the provision with amendments AMEND the definition of Certified Farm Nutrient Advisor to read: "Certified Farm Nutrient: is a person or entity certified... a. Has completed nutrient management training to at least intermediate <u>advanced</u> level, and..."	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
Department of Conservation	71759	PC1-10535	Objective 1 Support the provision with amendments AMEND Objective 1 to place a positive focus on water quality restoration and protection to give effect to the Vision and Strategy, through a reduction of the discharge of contaminants, including diffuse sources of nutrients and from erosion.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.

		PC1-10540	<p>Objective 3 Support the provision with amendments</p> <p>AMEND Objective 3 so that 10 year targets for water quality improvement be set for lakes using existing available expertise and models to prioritise those lakes to achieve a 20% improvement within 10 years. AND AMEND PPC1 to include the management of discharges of contaminants from point sources.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-10542	<p>Objective 4 Support the provision with amendments</p> <p>AMEND Objective 4 to remove the term 'continue'. AND AMEND the objective to remove uncertainty around 'further contaminant reductions' by implementing an allocation regime for contaminants based on current information and knowledge with the ability to amend this regime further information becomes available. AND AMEND clause (a) to require that at least intrinsic values are recognised and provided for. AND AMEND PPC1 to implement greater changes to the management of contaminant discharges in the short-term, through an allocation regime that recognises land type and achieves a greater short term improvement in water quality.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-10643	<p>Policy 1 Support the provision with amendments</p> <p>AMEND Policy 1 to replace "manage and require reductions" with "<u>reduce</u>". AND AMEND to provide clear definition of the terms low, moderate and high levels of</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be</p>

			contaminant discharge or replace these terms with other clearly defined terms.	disallowed.
		PC1-10646	<p>Policy 2 Support the provision with amendments</p> <p>AMEND Policy 2 to provide clearer direction to landowners and PPC1 users by amending Policy 2 to read: "Manage and require reductions in <u>Reduce</u> sub-catchment wide diffuse discharges..."</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10653	<p>Policy 3 Support the provision with amendments</p> <p>AMEND Policy 3 to read as follows: "Manage and require reductions in <u>Reduce</u> diffuse discharges of nitrogen..." AND AMEND to provide clarity of the outcomes of the proposed wording 'reducing average contaminant discharges over time'. AND AMEND PPC1 to introduce a more efficient land-based allocation regime.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10655	<p>Policy 4 Support the provision with amendments</p> <p>AMEND Policy 4 to provide clarity around the use of term cumulatively (ie the cumulative effects of each individual contaminant or of all contaminants together). AND AMEND to provide a definition for 'low discharging activities'. AND AMEND to provide greater specificity around the 'future' mitigation that is intended. AND AMEND to provide greater certainty about the future timeframe that is being referred to in</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.

			the Policy.	
		PC1-10661	<p>Policy 5 Support the provision with amendments</p> <p>RETAIN Policy 5. AND AMEND PPC1 to provide greater clarity about how water quality targets will be achieved. AND AMEND to implement a land-based allocation regime that allocates the discharge of contaminants to ensure ecosystem health and to ensure that the potential of natural resources are retained to meet the reasonably foreseeable needs of future generations.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10664	<p>Policy 6 Support the provision with amendments</p> <p>AMEND Policy 6 to provide greater direction to decision makers when they are considering applications for a non-complying land use change under Rule 3.11.5.7. ALTERNATIVELY, CONSIDER introducing a Prohibited Activity rule in place of 3.11.5.7 to avoid adverse effects of land use change on water quality.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10667	<p>Policy 7 Support the provision with amendments</p> <p>AMEND Policy 7 so that the criteria for identifying land suitability is used now to implement a land based allocation regime that achieves the purpose of the RMA by ensuring that the potential of natural and physical resources is sustained to meet the reasonably foreseeable needs of future generations.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.

			<p>AND AMEND to read: "...the policies and methods in this chapter. To ensure this occurs, collect information and undertake research to support this, including collecting information about current discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'.</p> <p>Any future allocation should consider the following principles:"</p> <p>AND DELETE Bullet points (a), (b), (c) and (d) <i>[NOTE that the submitter may have mistakenly requested that all of this be deleted from Policy 7, given that they also asked for Policy 7(b) and (d) to be amended].</i></p> <p>Consequential relief is that the deleted text should be included as a method under section 3.11.4 [see submission point 10633].</p> <p>AND AMEND clause (b) to clarify what is meant by flexibility of development of tangata whenua ancestral land and how this part of the policy will be achieved.</p> <p>AND AMEND clause (d) to include the term 'where appropriate' or wording with similar effect to ensure that new data and knowledge is used where it is relevant, reliable and accurate for the particular allocation being considered.</p>	
		PC1-10670	<p>Policy 8 Support the provision with amendments</p> <p>AMEND Policy 8 in a way that would see all wetland and lake sub-catchments being included as Priority 1 in Table 3.11- 2.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be</p>

				disallowed.
		PC1-10671	<p>Policy 9 Support the provision with amendments</p> <p>AMEND Policy 9 to clarify the support that the policy intends to provide for efficient and effective water quality improvements. AND AMEND to read: "...edge of field mitigation measures. Support measures that efficiently and effectively contribute to water quality improvements. this approach includes:..."</p> <p>AND AMEND to achieve greater clarification on what form engagement will take and a timeframe for when this can be expected to occur for each priority area category. AND REPLACE use of the word "mitigations" with "mitigation measures" in Policy 9. AND AMEND clause (c) to ensure that those mitigation measures with the greatest environmental outcomes are prioritised and acknowledging that this could require high cost options to achieve desired outcomes. AND AMEND clause (d) by replacing "a mitigation" with "mitigation measure(s)". AND AMEND clause (d) to achieve greater certainty around how this section will be achieved and the methodology that Council intends to apportion diffuse discharge reductions to each farming enterprise.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10676	<p>Policy 10 Support the provision with amendments</p> <p>AMEND Policy 10 to ensure that point source discharges are undertaken in a manner that recognises and provides for the values of</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own

			<p>individual water bodies. AND AMEND PPC1 so that point source discharges are considered as part of a land-based allocation regime. OR AMEND to ensure that the achievement of water quality goals is considered when processing consent applications for point source discharges. AND provide a definition for 'regionally significant industry'.</p>	<p>submissions, and seeks that it should be disallowed.</p>
		PC1-10694	<p>Policy 11 Support the provision with amendments</p> <p>AMEND Policy 11 to ensure that avoidance and then mitigation of adverse effects from point source discharges are achieved as far as reasonably practicable before offsetting is considered. AND AMEND Policy 11 to ensure that the significant values of water bodies are recognised and provided for when determining the suitability of offsetting to acknowledge instances where adverse effects on values cannot be offset.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC-10738	<p>Policy 12 Support the provision</p> <p>In the absence of a more appropriate allocation regime (which the submitter requests) there is support for the guidance in Policy 12 so it should be RETAINED.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-10739	<p>Policy 13 Support the provision with amendments</p>	<p>WPL opposes the submission because it is not consistent with</p>

			AMEND Policy 13 to include a common catchment expiry date for consent terms rather than a blanket 25 year consent term.	the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10742	Policy 14 Oppose the provision with amendments AMEND Policy 14 to require that the restoration of lakes be implemented using existing data and information from work already completed to avoid further delay in improving lake water quality.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10745	Policy 16 Support the provision with amendments RETAIN Policy 16 AND AMEND Policy 16 and PPC1 to include a land-based allocation regime.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10746	Policy 17 Oppose the provision with amendments AMEND Policy 17 to reflect the clear direction provided in higher level documents including the Resource Management Act, the National Policy Statement for Freshwater Management and the Vision and Strategy for Waikato and Waipā Rivers. AND DELETE all reference to the wording 'secondary benefit'.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10633	3.11.4 Methods	WPL opposes the

			<p>Support the provision with amendments</p> <p>ADD NEW Methods to achieve the new proposed objective [see submission point PC1-10521]. AND ADD a NEW Method which prioritises the capture of key information to inform the management of lakes with little or no recent water quality information e.g Te Otamanui Lagoon, Lake Rotongaroti, Lake Rotongaro, Lake Rotokaraka, Lake Hotoananga, Lake Pikopiko, Lake Komakoru, Lake Rotokaeo, Lake Opuatia. AND ADD a NEW method to prioritise further research on nutrient and sediment attenuation tools for use in lake catchments. AND ADD regulatory methods for private land in lake catchments where protection works on public land adjoining lakes has been completed, where the regulatory methods require fencing around waterbodies and the planting of vegetative buffers, together with compulsory implementation of farm management plans. AND ADD a NEW Method or Methods into PPC1 to actively reflect current best practice in relation to the protection of peat lakes. At a minimum the method or methods should focus on maintaining ground water levels over the summer periods, creating good buffer zones, and reducing cultivation on peat solids or establishing large setbacks from cultivation to reduce the effects of peat shrinkage on the lake ecosystem. AND ADD a NEW Method to ensure that the significant values of all wetlands are not impacted by elevated levels of nutrient and sediment by supporting:</p> <ul style="list-style-type: none"> • fencing setbacks of 10m for all wetlands, • requirements that Farm Environment Plans 	<p>submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
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			<p>identify critical wetland areas, and identify how elevated nutrients/sediment will be avoided or mitigated,</p> <ul style="list-style-type: none"> • requirements that Farm Environment Plans to identify where existing wetland drainage can be restored to prevent the drying of wetlands, • benchmarking of wetland nutrient and sediment status by 2023, and • establishment of a research programme to determine the attenuation capacity of natural wetlands. <p>AND ADD a NEW method to achieve the targets for the proposed Whangamarino wetland Freshwater Management Unit outlined in Appendix E and F of the submission, that supports:</p> <ul style="list-style-type: none"> • Investment in catchment wide programmes to reduce critical sediment sources • Minimum fencing set-backs of 10 metres for all contributing streams/rivers • Investment in collaborative stakeholder programmes to reduce Lake Waikare bank erosion • development of a mitigation strategy to address sediment, nitrogen and phosphorus from drains entering natural waterways in the Freshwater Management Unit • A review of all consents that relate to the Lower Waikato Flood Control Scheme by 2020, to identify the optimal approach to address water quality <p>AND ADD a NEW Method with the new text from Policy 7 <u>To ensure this occurs, collect</u></p>	
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			<u>information and undertake research... should take advantage of new data and knowledge'</u> [NOTE that the submitter may have mistakenly requested that all of this be deleted from Policy 7, given that they also asked for Policy 7(b) and (d) to be amended].	
		PC1-10750	Method 3.11.4.1 Support the provision RETAIN Method 3.11.4.1 as notified.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-1-751	Method 3.11.4.2 Oppose the provision No specific decision sought for Method 3.11.4.2.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10752	Method 3.11.4.3 AMEND Method 3.11.4.3 to place greater emphasis on the overall goal for Farm Environment Plans.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10753	Method 3.11.4.4 Support the provision with amendments	WPL opposes the submission because it is not consistent with

			<p>AMEND Method 3.11.4.4 to implement and action existing lake management plans and strategies as a priority.</p> <p>AND AMEND to provide greater certainty regarding the management of shallow lakes, including providing objectives, targets and limits for the future management and enhancement of shallow lakes.</p> <p>AND AMEND to ensure that existing farm plans are enforced and the expansion of work on private properties, beyond works already undertaken on Council and public conservation estate reserves, be undertaken as a matter of priority. This should include; retirement of wetland areas, increasing setbacks from waterways, and design and construction of sediment traps in key locations.</p> <p>AND AMEND so that where there is an evidence-based description of the problem, the focus needs to be on using this information in implementing lake catchment plans.</p> <p>AND RETAIN Method 3.11.4.4 (d), (e), (f) and (g)</p>	<p>the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-10759	<p>Method 3.11.4.5 Support the provision with amendments</p> <p>AMEND Method 3.11.4.5 to provide greater clarity for plan users around when a sub-catchment plan will be required. AND AMEND Method 3.11.4.5 (a) to ensure that mitigation measures with the greatest environmental benefits be prioritised recognising that this could require high cost options to achieve desired outcomes.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-10763	Method 3.11.4.6	WPL opposes the

			Support the provision RETAIN Method 3.11.4.6 as notified.	submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10764	Method 3.11.4.7 Support the provision with amendments AMEND Method 3.11.4.7 to ensure the immediate introduction of a land-based allocation regime, which can be amended as further information becomes available.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10765	Method 3.11.4.8 Support the provision with amendments AMEND Method 3.11.4.8 to see the immediate introduction of an allocation regime that considers land type and can be amended as further information becomes available.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10766	Method 3.11.4.9 Support the provision RETAIN Method 3.11.4.9 as notified.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-11502	Method 3.11.4.10 Support the provision with amendments	WPL opposes the submission because it

			<p>AMEND Method 3.11.4.10 in a way that will ensure the coordinated monitoring of wetland and coastal environments with the most urgent accounting and monitoring being required for:</p> <ul style="list-style-type: none"> • wetlands (wetland extent/buffer extent, soil mineral/organic content (sediment), soil phosphorous, soil nitrogen, vegetation) • freshwater species (fish) as a key indicator for ecosystem health • Macroinvertebrate Community Index - rivers • Waikato River Delta (estuarine receiving environment). 	is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		POC1-11052	<p>Method 3.11.4.11 Support the provision with amendments</p> <p>AMEND Method 3.11.4.11 to make a clear link between this method for monitoring and evaluation the implementation of Chapter 3.11 and the accounting and monitoring system developed under Method 3.11.4.10, AND AMEND Method 3.11.4.11 to provide more specificity around the frequency of reporting, with 3-yearly reporting recommended.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-11503	<p>Method 3.11.4.12 Support the provision</p> <p>RETAIN Method 3.11.4.12.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-11054	Rules 3.11.5	WPL opposes the

			<p>Support the provision with amendments</p> <p>PUT ON HOLD the Rules [in section 3.11.5] until an evaluation is undertaken to illustrate whether the rules proposed are the most appropriate way to achieve the objectives. If the existing rules are determined not to be the most appropriate, replacement rules would need to be implemented in PPC1</p> <p>AND REVIEW the Permitted Activity Rules to ensure they do not authorise activities that would not achieve the standards in s70 RMA, AND ensure any rules for activities that do not meet these standards are controlled activities as a minimum</p> <p>AND AMEND the stock exclusion provisions in the Rules to require that sheep are excluded from outstanding water bodies, and that cattle, horses, deer and pigs are excluded from all water bodies, including ephemeral water bodies. This should also be reflected in Schedule C and throughout Chapter 3.11</p> <p>AND ADD additional rule provisions to protect inanga spawning habitat.</p>	<p>submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		V1PC1-418	<p>Rule 3.11.5.2</p> <p>Oppose</p> <p>AMEND the date in Rule 3.11.5.2(5) to that originally notified in PPC1 (31 March 2019).</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-11056	<p>Rule 3.11.5.3</p> <p>Oppose the provision with amendments</p>	<p>WPL opposes the submission because it is not consistent with</p>

			No specific decision sought in terms of Rule 3.11.5.3's Certified Industry Schemes provisions.	the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-419	Rule 3.11.5.3 Oppose with amendments AMEND the dates in Rules 3.11.5.3(5)(a) and (b) to those originally notified in PPC1. AND AMEND Rule 3.11.5.3 so that adequate support and resourcing to prepare FEP's is provided by Council and industry bodies.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-11057	Rule 3.11.5.4 Support the provision with amendments AMEND Rule 3.11.5.4(5)(d) to exclude sheep. AND AMEND Rule 3.11.5.4 by clarifying the activity status as to whether it is a controlled or permitted activity.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-420	Rule 3.11.5.4 Oppose AMEND the dates in Rules 3.11.5.4 for when FEPs are to be provided, under the heading Dates, I and II, to those originally notified in PPC1 (that is 1 March 2022 and 1 March 2025). [NOTE the submitter also requests that dates for provision of FEPs in Rule 3.11.5.4(1) and 3.11.5.4(2) also be changed to those originally notified, however the dates in Rule 3.11.5.4(1) and 3.11.5.4(2) do not refer to FEPs, but to the dates when Permitted	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.

			Activities become Controlled Activities under the rule (see pages 32 and 33 of the submission). As the reasons for the decision requested also refer to FEPs, and not dates for when activities become Controlled, it is assumed that the requested changes to Rule 3.11.5.4(1) and 3.11.5.4(2) is a mistake in the submission.] AND AMEND Rule 3.11.5.4 so that adequate support and resourcing to prepare FEP's is provided by Council and industry bodies.	
		V1PC1-421	Rule 3.11.5.5 Oppose AMEND the date in Rule 3.11.5.5 to that originally notified in PPC1.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-11058	Rule 3.11.5.6 Support the provision RETAIN Rule 3.11.5.6.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-11059	Rule 3.11.5.7 Support the provision RETAIN Rule 3.11.5.7 with stronger policy guidance to support its use. ALTERNATIVELY, CONSIDER a prohibited activity rule to replace Rule 3.11.5.7, as a mechanism to	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be

			avoid adverse effects of land use change on water quality.	disallowed.
		PC1-11060	Schedule A Support the provision with amendments RETAIN Schedule A. AND AMEND Schedule A to require prompt information collection over a shorter period of time, verification of stocking numbers via reconciliations/receipts, updates to information required regularly (6 monthly) including on stocking numbers and land size (as a result of subdivision/amalgamation).	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-11065	Schedule B Support the provision RETAIN Schedule B.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-423	Schedule B Support with amendments AMEND the 'starting' date in Schedule B(e) (1 May 2020) to the date originally notified in PPC1 (1 September 2018).	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-11055	Schedule C Support the provision with amendments AMEND Schedule C to require that sheep are excluded from outstanding water bodies, and	WPL opposes the submission because it is not consistent with the decisions sought by

			<p>that cattle, horses, deer and pigs are excluded from all water bodies, including ephemeral water bodies. This should also be reflected throughout Chapter 3.11.</p> <p>AND AMEND Schedule C to require that all new fencing alongside permanent rivers, lakes and outstanding waterbodies be setback at least 10m from the bed of the waterbody and wetlands. For intermittent rivers and wetlands a 5m setback for new fencing is sought.</p> <p>AND AMEND PPC1 permitted and controlled activity rules in accordance with these changes to Schedule C.</p>	<p>WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-12393	<p>Schedule 1 Support the provision with amendments</p> <p>AND AMEND Schedule 1(2)(b)(iii) to require 10m fencing setbacks for cultivation from permanent rivers, lakes and outstanding waterbodies and 5m cultivation setbacks from intermittent rivers and wetlands. For peat lakes, a 20m setback for cultivation should be implemented.</p> <p>AND AMEND Schedule 1 to require that setbacks for grazing and cultivation on sloping land be evaluated in relation to soil type to ensure an appropriate setback distance is achieved (the Horizons Regional Council guideline is suggested as a useful start). A 20m setback for sloping land of 20 degrees or more could be appropriate.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-12394	<p>Schedule 1 Support the provision with amendments</p> <p>AMEND Schedule 1 to provide that Farm Environment Plans recognise the potential role for wetlands to assist in the management of</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks</p>

			water quality and to recognise their significant values by (a) ensuring all wetlands, permanent and ephemeral are identified in Farm Environment Plans; (b) that the management of nutrients and sediment ensures that adverse effects on wetland systems and their values are avoided or mitigated; and (c) existing drainage of wetlands is stopped and any future drainage of wetlands is avoided.	that it should be disallowed.
		PC1-10647	Schedule 1 Support the provision with amendments AMEND Schedule 1 to more clearly define the goals for a Farm Environment Plan. AND AMEND Schedule 1 to require Farm Environment Plans to identify critical nitrogen and phosphorous sources for lakes, and to identify on-farm methods to reduce nitrogen, phosphorus and sediment discharges to lakes. AND AMEND Schedule 1 so that Farm Environment Plans identify where existing drains can be restored or intercepted to reduce nutrient and sediment inputs into lakes.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10536	Table 3.11-1 Support the provision with amendments REINSTATE the withdrawn parts of Table 3.11-1. AND establish attributes, limits or targets for all contaminants specified in the Vision and Strategy (nutrients, faecal and sediment) for the whole of the Waipā catchment and all tributaries of the Waikato, lakes, wetlands and the coastal environment (refer submitter's Appendices A and B, and D to I). AND AMEND the headings of Table 3.11-1 to	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.

			<p>provide dates for when targets are to be met. AND AMEND to include interim 20-year targets to sit alongside the 10-year targets and 80-year targets. A 20 per cent improvement in water quality over 20 years is recommended. AND RAISE water quality targets for lakes, so that lake water quality is enhanced, to safeguard ecosystem health and life supporting capacity of lakes, and to ensure that 'long term restoration and protection of water quality' is achieved. AND INSERT attribute targets for Pungarehu Canal/Stream to Table 3.11-1. AND INSERT targets for suspended sediment and deposited fine sediment in Table 3.11-1. AND AMEND Table 3.11-1 to recognise and identify the values of outstanding freshwater bodies (in discussion with the Department of Conservation) and as a minimum, these outstanding freshwater bodies should include the Waikato River including the river mouth and delta, the Whangamarino wetland, the Waitomo Caves/River, the Waikato Peat lakes and Lake Rotokotuku. AND FURTHER INVESTIGATE the water quality effects (such as nitrate toxicity) on ecosystem health, particularly with respect to native fish and macroinvertebrates, and make changes to targets as appropriate. Refer to specific changes requested in the submitter's Appendix B "Changes sought to trophic state and toxicity attributes by Proposed Plan Change 1". AMEND Table 3.11-1 to include attributes for a Whangamarino Wetland Fresh Water Management Unit, as described in the submitter's Appendix E and F.</p>	
		V1PC1-1006	Table 3.11-1	WPL opposes the

			<p>Support with amendments</p> <p>RETAIN Table 3.11-1. AND establish attributes, limits or targets for all contaminants specified in the Vision and Strategy (nutrients, faecal and sediment) for the whole of the Waipā catchment and all tributaries of the Waikato, lakes, wetlands and the coastal environment (refer submitter's PC1 submission Appendices A and B, and D to J). AND AMEND the headings of Table 3.11-1 to provide dates for when targets are to be met. AND AMEND to include interim 20-year targets to sit alongside the 10-year targets and 80-year targets. A 20 per cent improvement in water quality over 20 years is recommended. AND AMEND to raise water quality targets for lakes, so that lake water quality is enhanced, to safeguard ecosystem health and life supporting capacity of lakes, and to ensure that 'long term restoration and protection of water quality' is achieved. AND ADD attribute targets for Pungarehu Canal/Stream to Table 3.11-1. AND AMEND to ensure all streams have numerical values. AND ADD targets for suspended sediment and deposited fine sediment in Table 3.11-1. AND AMEND Table 3.11-1 to recognise and identify the values of outstanding freshwater bodies (in discussion with the Department of Conservation) and as a minimum, these outstanding freshwater bodies should include the Waikato River including the river mouth and delta, the Whangamarino wetland, the Waitomo Caves/River, the Waikato Peat lakes and Lake Rotokotuku.</p>	<p>submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
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			AMEND Table 3.11-1 to include attributes for a Whangamarino Wetland Fresh Water Management Unit, as described in the submitter's PC1 submission Appendix E and F.	
		V1PC1-461	75 th percentile nitrogen leaching value definition Oppose with amendments RETAIN the Definition - 75th percentile nitrogen leaching value as originally notified in PPC1. OR AMEND to provide an additional 18 month period for compliance to account for the delay created by V1.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
E				
F				
Farmers 4 Positive Change (F4PC)	73355	PC1-10417	Objective 1 Oppose the provision with amendments REMOVE the first section of Objective 2: 'Waikato and Waipā communities and their economy benefit from the restoration and protection of water quality in the Waikato River catchment' and include it within Objective 1 AND AMEND PPC1 to adopt a sub-catchment approach to managing land use and water quality tailored to the specific issues faced by the sub-catchment, with a 30 year timeframe to achieve its objectives and a 15-year review. AND AMEND PPC1 after working with farmers to form a long-term plan that achieves the Vision and Strategy AND REVIEW the interpretation of the Vision and Strategy, including numerical interpretation through Table 3.11-1 AND AMEND Table 3.11-1 to ensure the numerical parameters are achievable while giving	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			effect to the Vision and Strategy AND AMEND PPC1 to have realistic achievable goals AND AMEND PPC1 to give farmers confidence to invest and encourage young people into the sector.	
		PC1-10420	Objective 2 Oppose the provision with amendments AMEND Objective 2 to make it explicit that it is to enable people and communities to continue to provide for their social, economic, and cultural well-being, and to provide for future generations AND DELETE the first section of Objective 2: " Waikato and Waipā communities and their economy benefit from the restoration and protection of water quality in the Waikato River catchment " and include it within Objective 1 Objective 2: AMEND PPC1 to adopt a sub-catchment approach to managing land use and water quality tailored to the specific issues faced by the sub-catchment, with a 30 year timeframe to achieve its objectives and a 15-year review.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10427	Rule 3.11.5.4 Support the provision with amendments DELETE the Rule 3.11.5.4 Nitrogen Reference Point AND AMEND to introduce a sub-catchment planned approach with the Farm Environment Plan as a monitoring tool AND AMEND Rule 3.11.5.4 to bring stock exclusion into line with the National Stock Exclusion requirements, which relate to exclusion of cattle, deer, and pigs, from	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific

			<p>permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier, or other technologies) on flat land and rolling land, but not on hill country</p> <p>AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards</p> <p>AND DELETE any provisions that hold land uses to historic discharge levels or stocking rates</p> <p>AND AMEND Rule 3.11.5.4 to use Farm Environment Plans as a tool to understand land use suitability and manage contaminant loss</p> <p>AND AMEND to include a range of actions in Farm Environment Plans, such as avoid farming older cattle on slopes in winter or when wet; farm cattle extensively on slopes; fence off swamps and plant out to provide silt traps to remove sediment; construct sediment traps near the headwaters to help slow flow and trap sediment; plant shade trees away from waterways to discourage stock camps and nutrient build-up; use temporary electric fencing where and when necessary; plant poplar poles on erosion prone slopes; identify suitable units for planting pines at farmer discretion; fence off waterways on more intensively farmed areas of the farm and provide reticulated water for stock.</p>	<p>decisions sought by WPL in its own submissions.</p>
		PC1-10433	<p>Rule 3.11.5.6</p> <p>Support the provision with amendments</p> <p>AMEND Rule 3.11.5.6 to use Farm Environment</p>	<p>WPL supports and opposes the submission because it is generally consistent</p>

			Plans as a tool to understand land use suitability and manage contaminant loss AND AMEND to include a range of actions in Farm Environment Plans, such as avoid farming older cattle on slopes in winter or when wet; farm cattle extensively on slopes; fence off swamps and plant out to provide silt traps to remove sediment; construct sediment traps near the headwaters to help slow flow and trap sediment; plant shade trees away from waterways to discourage stock camps and nutrient build-up; use temporary electric fencing where and when necessary; plant poplar poles on erosion prone slopes; identify suitable units for planting pines at farmer discretion; fence off waterways on more intensively farmed areas of the farm and provide reticulated water for stock.	with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10428	Schedule B Oppose the provision REMOVE the Schedule B Nitrogen Reference Point AND AMEND to introduce a sub-catchment planned approach with the Farm Environment Plan as a monitoring tool.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
FarmRight	73720	PC1-5381	Objective 1 Support the provision	WPL opposes the submission because it is not consistent with

			RETAIN Objective 1.	the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-5383	Objective 3 Support the provision RETAIN Objective 3.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-5384	Policy 1 Support the provision with amendments AMEND Policy 1(b) to read: "b. Requiring farming <u>all</u> activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges; and..." AND AMEND Policy 1 so 'moderate to high levels of contaminant discharge' means discharges of nitrogen, phosphorus, microbial pathogens and/or E.coli which exceed industry standard practice for contaminant loss for the relevant industry or rural sector or sub-sector.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-5388	Policy 4 Support the provision with amendments AMEND Policy 4 to clarify what is meant by 'low levels'. AND AMEND to establish a new controlled activity	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its

			<p>rule requiring any new discharging activity to be operating at best practice. AND AMEND Policy 4 to read: "Manage sub-catchment wide diffuse discharge of nitrogen, phosphorus, sediment <u>E.coli</u> and microbial pathogens, and enable existing and new low discharging activities <u>where appropriate, and subject to new activities establishing in accordance with industry standard management principles</u>, to continue provided ...diffuse discharges of nitrogen, phosphorus, sediment <u>E.coli</u> and microbial pathogens in order for Objective 1 to be met." AND AMEND so that for the purposes of Policy 4, 'low levels of contaminant discharge' is to mean 'discharges of nitrogen, phosphorus, microbial pathogens and/or E.coli which are below industry or sector standard practice levels for the relevant agricultural or rural sector or sub-sector and type of operation.'</p>	<p>own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-5391	<p>Policy 6 Support the provision RETAIN Policy 6.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-5392	<p>Policy 7 Support the provision RETAIN Policy 7.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be</p>

				disallowed.
		PC1-5396	<p>Rule 3.11.5.3 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.3 to ensure that all key dates are two years post PPC1 being made operative and all other dates are extended by the same length.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-5398	<p>Rule 3.11.5.4 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.4 to be a permitted activity.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-5402	<p>Rule 3.11.5.6 Support the provision with amendments</p> <p>RETAIN Rule 3.11.5.6.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-5403	Rule 3.11.5.7	WPL supports and

			<p>Support the provision with amendments</p> <p>AMEND Rule 3.11.5.7 to separate into three new rules, setting out: 1. Land use changes which decrease nutrient loss will be a controlled activity; 2. Land use changes which are neutral in relation to nutrient loss will be a restricted discretionary activity; 3. Land use changes which increase nutrient loss will be a non-complying activity.</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-5416	<p>Schedule B</p> <p>AMEND Schedule B(f) to read: "The reference period is the three financial years covering 2013/2014, 2014/2015 and 2015/2016, except for commercial vegetable production in which case the reference period is July 2006 to 30 June 2016. <u>In instances where the land use, and associated nitrogen leaching, has changed significantly throughout the reference period, the only applicable years for the purposes of establishing the Nitrogen Reference Point will be those years where the current land use was operating.</u>"</p> <p>AND AMEND Schedule B(g) to read: "The following records ... v. water use records for irrigation (to be averaged over 3 years or longer) in order to determine irrigation application rates."</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-9656	<p>Schedule 1</p> <p>Support the provision</p>	<p>WPL opposes the submission because it</p>

			No specific decision sought for Schedule 1.	is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-9634	<p>75th percentile nitrogen leaching value definition Support the provision with amendments</p> <p>AMEND the definition of '75th percentile nitrogen leaching value' to read: "The 75th percentile value... received by the Waikato Regional Council <u>12 calendar months following the provisions of PPC1 becoming operative by 31 March 2019. For the avoidance of doubt, the 75th percentile value is to be determined on farming enterprise basis. That is, that the highest 25th percentile of each industry (dairy farming, drystock and commercial vegetable production) will be required to reduce.</u>"</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
Federated Farmers of New Zealand	74191	V1PC1-122	<p>Objective 1 Oppose with amendments</p> <p>AMEND Objective 1 to read: 'Objective 1: Long term maintenance, restoration and/or protection of water quality for sub-catchment and/or Freshwater Management Unit... <u>Manage By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water or to land in circumstances where it may enter water, for the purposes of assisting to achieve the water quality outcomes anticipated by the Vision & Strategy and the values^ by 2096. result in achievement of the</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own

			<p>restoration and protection of the 80 year water quality attribute^ targets^ in Table 3.11-1.</p> <p>AND AMEND to make any consequential amendments to the Reasons for Adopting Objective 1</p> <p>OR AMEND to develop a more realistic set of 80 year numeric attribute states that address the concerns raised by the submission.</p> <p>IF it is not clear that it is 'discharges' being 'managed' THEN AMEND to clarify this intention.</p>	submissions.
		V1PC1-129	<p>Objective 3 Oppose with amendments</p> <p>AMEND Objective to read: 'Objective 3: Short-term improvements in water quality in the first stage of <u>maintenance</u>, restoration and/or protection of water quality... Actions <u>are identified put in place</u> and implemented <u>by 2026</u> to <u>reduce manage</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>to maintain, restore and/or protect water quality for each sub-catchment and/or Freshwater Management Unit</u> and are sufficient to achieve ten per cent of the required change between current water quality and <u>achieving the water quality outcomes anticipated by the Vision & Strategy and values^</u> the 80 year water quality attribute^ targets^ in Table 3.11-1. A ten per cent change toward the long term water quality improvements is indicated by the short term water quality attribute^ targets^ in Table 3.11-1.</p> <p>AND AMEND to make any consequential amendments to the reasons for adopting Objective 3.</p> <p>OR AMEND the short term targets on Table 3.11-</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>1 to achieve realistic and reliable targets based on reasonable assumptions that address the concerns raised in this submission.</p> <p>OR AMEND the short term targets in Table 3.11-1 so that they are based on the NOF bands as opposed to specific numbers.</p>	
		V1PC1-143	<p>Objective 4 Oppose with amendments</p> <p>ADD a NEW paragraph (b) to Objective 4 to read: '<u>addressing information gaps and gaining an understanding of the current water state, water quality issues and the causes for each sub-catchment and the relationship with other sub-catchments; and</u>'</p> <p>AND AMEND Objective 4(b) to read: 'bc. recognizing that further contaminant reductions will may be required by subsequent regional plans...'</p> <p>ADD a NEW paragraph (d) to Objective 4 to read: '<u>d. recognising and providing for flexibility in the implementation of on-farm management measures to respond to changes brought about by climatic events, natural hazards, economic conditions, health and safety, and animal welfare requirements.</u>'</p> <p>IF Table 3.11-1 is not amended as requested by the submission THEN AMEND Objective 4(a) to clarify that the intention is to achieve 10% of the journey towards the water quality outcomes contemplated by the Vision and Strategy and the values.</p> <p>AND AMEND to make any consequential changes to the Reasons for adopting Objective 4.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10815	Policy 1	WPL supports and

			<p>Support the provision with amendments</p> <p>RETAIN Policy 1, subject to refinement through the further submissions process AND AMEND to read as follows: "<u>Manage and require reductions in sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, where improvements in the levels of specific contaminants will contribute to the relevant ten-year target in Table 3.11-1</u>, by:</p> <p>a. Enabling activities with a low level of contaminant discharge to water bodies provided those discharges do not increase <u>when assessed on a sub-catchment basis</u>;..."</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-162	<p>Policy 1 Oppose with amendments</p> <p>AMEND Policy 1 to read: 'Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens Manage and require reductions in sub-catchment wide diffuse and point source discharges of nitrogen, phosphorus, sediment, and microbial pathogens <u>to assist with achieving the short term water quality attribute targets in Table 3.11-1 by adopting Most Practicable Actions for diffuse discharges and Best Practicable Option for point source discharges.</u>' AND DELETE paragraphs (a), (b) and (c) from Policy 1.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-12754	<p>Policy 2 Support the provision with amendments</p> <p>RETAIN Policy 2, subject to refinement through the further submissions process. AND ADD Policy 2 (f), as follows:</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its</p>

			<p><u>"f. When determining an appropriate duration for any consent granted consider the following matters:</u></p> <p><u>i. A consent term of a minimum of 25 years is appropriate; and</u></p> <p><u>ii. A consent term exceeding 25 years, where the applicant demonstrates the approaches set out in Policy 2.a. – 2.e. will be met; and</u></p> <p><u>iii. 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>iv. 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>	<p>own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-12755	<p>Policy 2 Support the provision with amendments</p> <p>AMEND Policy 2 (e) as appropriate to give effect to the 'Keeping stock out of our waterways' provisions of the government's Clean Water Package 2017.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10816	<p>Policy 2 Support the provision with amendments</p>	<p>WPL supports and opposes the</p>

			<p>AMEND Policy 2 (a) to clarify that discharges to water bodies will be assessed on a sub-catchment basis.</p> <p>AND AMEND to provide an exemption for those emitting less than 15 kgN/ha, by AMENDING Policy 2 (a) to read:</p> <p>"a. Taking a tailored, risk based approach to define mitigation actions on the land that will reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>when assessed on a sub-catchment basis</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 <u>where the Nitrogen Reference Point is not less than 15KgN/ha;</u>"</p>	<p>submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10820	<p>Policy 4 Support the provision with amendments</p> <p>RETAIN Policy 4, subject to refinement through the further submissions process.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		V1PC1-188	<p>Policy 4 Support with amendments</p> <p>AMEND the final sentence of Policy 4 to read: '... reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens in order <u>to assist with making progress towards</u> for Objective 1 to be met.'</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this</p>

				would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10822	<p>Policy 6 Oppose the provision with amendments</p> <p>AMEND Policy 6 to read: "Except as provided for in Policy 16 <u>Policies 1, 2, 3, 4 and 5</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." AND AMEND PPC1 so that land users are able to modify their production systems within present general land uses as a permitted activity, with the proviso that nitrogen discharge does not exceed 15kgN/ha across the production unit as a whole, and that vegetable production is exempt from the general nutrient discharge restrictions.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-194	<p>Policy 6 Oppose</p> <p>REPLACE Policy 6 with the following: '<u>Policy 6: Restricted Discretionary and Discretionary Activities</u> <u>Grant consent to applications for farming activities that apply for consent under Rule</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the

			<p><u>3.11.5.6 (Restricted Discretionary Activity) or Rule 3.11.5.7 (Discretionary Activity) that can demonstrate the following:</u></p> <p><u>a. The Most Practicable Actions to manage the discharge of nitrogen, phosphorus, sediment and microbial pathogens on a proportional basis will be implemented by the farm operator; and</u></p> <p><u>b. Monitoring, record keeping, reporting and information provision to the Waikato Regional Council by the consent holder will be undertaken in an efficient and effective manner; and</u></p> <p><u>c. Where consent is sought to allow an exceedance of permitted or controlled activity nitrogen limits that the risks associated with phosphorus, sediment and microbial pathogen discharges from the farming activity can be reasonably managed.'</u></p>	<p>submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10823	<p>Policy 7 Oppose the provision</p> <p>AMEND Policy 7 to read: "Policy 7: Preparing for allocation in the future/Te Kaupapa Here 7: Kia takatū ki ngā tohanga hei ngā tau e E Teuteu ki he te heke <u>mai Ana</u> Prepare for further diffuse discharge reductions and any future property or enterprise level allocation of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will <u>may</u> be required by subsequent regional plans, by implementing the policies and methods in this chapter. To ensure this occurs, collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'.</p> <p>Any future allocation should consider the following principles:</p> <p>a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes of allocation); and</p> <p>b. Allowance for flexibility of development of tangata whenua ancestral land; and</p> <p>c. Minimise social disruption and costs in the transition to the 'land suitability' approach; and</p> <p>d. Future allocation decisions should take advantage of new data and knowledge.</p> <p><u>The Nitrogen Reference Point established under Policy 2.c. is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future."</u></p>	
		V1PC1-224	<p>Policy 7 Oppose with amendments</p> <p>AMEND Policy 7 to read: 'Policy 7: Preparing for allocation in the future. Prepare for <u>potential</u> further diffuse discharge reductions or <u>mitigations</u> and any future property or enterprise level allocation of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will <u>may</u> be required by subsequent regional plans, by implementing the policies and methods in this chapter. To <u>assist</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific</p>

			<p>with this ensure this occurs, collect information and undertake research to support this is, including:</p> <p>a. collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges,' AND ADD a NEW paragraph (b) to Policy 7 to read: '<u>b. collating information obtained from the Catchment Profiles and sub-catchment management plans, models or data obtained through implementation of this Plan change, and</u>' AND AMEND Policy 7 to read: '<u>c. researching the spatial variability of land use and contaminant losses as well as the hydrological relationship between sub-catchments, ground and surface water and contaminant loss, and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'.</u>' AND ADD the following sentence after proposed paragraph (c): '<u>In preparing for the future, the Nitrogen Reference Point established under Policy 2(c) is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</u>' AND DELETE the sentence 'any future allocation should consider the following principles'. AND DELETE the following paragraphs (a), (b), (c) and (d). AND DELETE footnote 5.</p>	<p>decisions sought by WPL in its own submissions.</p>
		PC1-10829	<p>Policy 12 Support the provision with amendments</p> <p>RETAIN Policy 12, subject to refinement through the further submissions process.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its</p>

				own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10840	<p>Method 3.11.4.7 Oppose the provision with amendments</p> <p>AMEND Method 3.11.4.7 to read: "3.11.4.7 Information needs to support any future allocation/Ngā pā rongo e hiahiatia ana hei taunaki i ngā tohanga o anamata Gather information and commission appropriate scientific research to inform any future framework for the allocation <u>the management</u> of diffuse discharges including: a. Implementing processes that will support the setting of property or enterprise level diffuse management of discharges limits in the future..."</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-295	<p>Method 3.11.4.7 Oppose with amendments</p> <p>AMEND Method 3.11.4.7 to read: 'Information needs to support any future allocation Gather information and commission appropriate scientific research to inform any future framework for the allocation <u>the management</u> of diffuse <u>and point source discharges of nitrogen, phosphorus, sediment and microbial pathogen</u> including:</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent

			<p>AND AMEND Method 3.11.4.7(a) to read: 'Implementing processes that will support the setting of property or enterprise level diffuse management of discharges limits in the future.' AND AMEND Method 3.11.4.7(b) to read: 'Researching: i. the quantum of contaminants that can be discharged at a sub-catchment and Freshwater Management Unit^ scale while meeting the Table 3.11-1 water quality attribute^ targets^ (this will include understanding sub-catchment characteristics such as attenuation, ground water travel time, sink, source and travel pathways, interaction or relationship between contaminants, and the impact of historical events e.g. landslips). ii. Whether the appropriate water attribute targets can be developed for 2096 or whether some interim targets or alternative approach is more appropriate. This will include an assessment as to whether these targets are consistent with the values^ and are likely to result in the Vision and Strategy being achieved. iii. Whether there are alternative actions that are consistent with the values^ and likely to achieve the Vision and Strategy that result in lower economic, social and cultural cost and disruption. ii. Methods to categorise and define 'land suitability'. iii. Tools for measuring or modelling discharges from individual properties, enterprises and sub-catchments, and how this can be related to the Table 3.11-1 water quality attribute^ targets^.'</p>	with the specific decisions sought by WPL in its own submissions.
		PC1-10841	Method 3.11.4.8 Oppose the provision with amendments	WPL supports and opposes the submission because it

			<p>AMEND Method 3.11.4.8 to read: "3.11.4.8 Reviewing Chapter 3.11 and developing an allocation <u>discharges management</u> framework for the next Regional Plan/Te arotake i te Upoko 3.11, te whakarite hoki i tē tehi anga toha para mō te Mahere ā -Rohe e whai ake ana Waikato Regional Council will: a. Develop discharge allocation <u>management</u> frameworks for individual properties and enterprises based on information collected under Method 3.11.4.7, taking into account the best available data, knowledge and technology at the time; and b. Use this to inform future changes to the Waikato Regional Plan to manage discharges of nitrogen, phosphorus, sediment and microbial pathogens at a property or enterprise level to meet the targets^ in the Objectives."</p>	<p>is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-300	<p>Method 3.11.4.8 Oppose with amendments</p> <p>AMEND the short title of Method 3.11.4.8 to read: 'Reviewing Chapter 3.11 and an allocation <u>discharge management</u> frameworks for the next Regional Plan' AND ADD a NEW paragraph (a) to Method 3.11.4.8 to read: '<u>Carry out a comprehensive review of Chapter 3.11, including the progress towards the 10 year targets and the Vision and Strategy and values, the mitigations the have been adopted by point source and diffuse discharge and the extent to which they have been implemented, the prioritisation of sub-catchments in Map 3.11-2 (and the extent to which that assisted with progress) and any other</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>matters relevant to assessing the efficacy of Chapter 3.11 in achieving or assisting to achieve the Objectives of this chapter.'</u></p> <p>OR AMEND to link with paragraph (a) of Method 3.11.4.11.</p> <p>AND AMEND Method 3.11.4.8(a) to read: '<u>b. In consultation with the community, identify and develop discharge allocation management frameworks for individual properties and enterprises based on information collected under Method 3.11.4.7 (and taking into account all contaminants and their sources and management at a sub-catchment, Freshwater Management Unit and/or property or enterprise level), taking into account the best available data, knowledge and technology at the time but clearly identifying uncertainties, assumptions and confidence levels; and'</u> AND AMEND Method 3.11.4.8(b) to read: '<u>b.c. Use this to inform changes to the Waikato Regional Plan to manage discharges of nitrogen, phosphorus, sediment and microbial pathogens at a property or enterprise level to assist with achieving the Vision and Strategy and values^.</u> meet the targets^ in the Objectives.'</p>	
		V1PC1-308	<p>Method 3.11.4.8 Oppose with amendments</p> <p>AMEND Method 3.11.4.11(a) to read: 'Review and report on the progress towards achievement of the <u>short term targets^ in Objective 3 (including the implications of prioritising sub-catchments in Table 3.11-2) and the progression towards the outcomes anticipated by the Vision and Strategy and values^ referred to in Objective 1 80-year water quality objectives of Chapter 3.11</u> (this will take into account all</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific</p>

			<p><u>sources contributing towards water quality and all actions contributing towards improvement).</u>'</p> <p>AND AMEND Method 3.11.4.11(b) to read: 'Research and identify methods to measure actions at a sub-catchment, property and enterprise level, and their contribution to reductions in the <u>point source and diffuse</u> discharge of contaminants.'</p> <p>AND AMEND Method 3.11.4.11(d) to read: 'Collate data on the number of land use resource consents issued under the rules in the chapter, <u>the number of point source discharge consents issued under the Regional Plan</u>, the number of Farm Environment Plans completed, compliance with the actions listed in Farm Environment Plans <u>point source and diffuse discharge consents</u>, Nitrogen Reference Points for properties and enterprises, and <u>any contaminant nitrogen</u> discharge data reported under <u>Farm Environment Plans or resource consents.</u>'</p>	<p>decisions sought by WPL in its own submissions.</p>
		PC1-10844	<p>Rules 3.11.5 Support the provision with amendments</p> <p>AMEND 3.11.5 Rules to bring them into alignment with the Policies and Methods in PPC1, as sought to be amended by the submissions made herein, and subject also to additional refinement through the further submissions process. AND ADD a NEW rule to PPC1 to implement the policy of providing an exemption from Farm Environment Plans and Certified Industry Schemes for those emitting less than 15KgN/ha. AND DELETE Rule 3.11.5.2 (4) (c). AND ADD a NEW permitted activity rule to read: "The use of land for farming activities (excluding</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>commercial vegetable production) where the property area is greater than 4.1 hectares is a Permitted Activity provided that:</u></p> <p><u>1) The change in the use of land is not from non-milking dairy farming to milking dairy farming; or</u></p> <p><u>2) The change in the numbers of breeding cattle, deer, pigs or horses does not exceed 15% of the numbers used to establish the Nitrogen Reference Point; or</u></p> <p><u>3) The change in the numbers of trading cattle, deer, pigs or horses does not exceed 15% of the numbers used to establish the Nitrogen Reference Point."</u></p> <p>AND AMEND PPC1 so that normal farming activities in rural areas are permitted activities.</p> <p>AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities.</p>	
		V1PC1-499	<p>Rules 3.11.5 Support</p> <p>ADD a NEW rule to read: <u>'3.11.5.4A Controlled Activity Rule – The use of land for farming activities exceeding the Nitrogen Reference Point Except as provided for in Rules 3.11.5.1 to 3.11.5.5, the use of land for farming activities (excluding commercial vegetable production) 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, irrespective of whether or not the farming activity is registered to a Certified Industry Scheme where:</u></p> <p><u>a. The property is registered with the Waikato Regional Council in conformance with Schedule</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>A; and</u></p> <p><u>b. A Farm Environment Plan which has been prepared in accordance with Schedule 1 and has been approved by a Certified Farm Environment Planner is provided to the Waikato Regional Council; and</u></p> <p><u>c. A Nitrogen Reference Point has been produced for the property or enterprise in conformance with Schedule B and the diffuse discharge of nitrogen associated with the use of the land for farming activities will exceed the Nitrogen Reference Point; and</u></p> <p><u>d. The stock exclusion and setback requirements in Schedule C are and/or will be complied with; and</u></p> <p><u>e. The diffuse discharge of nitrogen from the property or enterprise does not exceed the 75th percentile nitrogen leaching value; and</u></p> <p><u>f. If the property is subdivided, a new Nitrogen Reference Point has been calculated for all of the lots created by the subdivision in conformance with Schedule B for each individual lot where the diffuse discharge of nitrogen associated with the use of the land for farming activities will exceed the Nitrogen Reference Point(s);</u></p> <p><u>is a Controlled Activity.</u></p> <p><u>Matters of Control</u></p> <p><u>Waikato Regional Council reserves control over the following matters:</u></p> <ol style="list-style-type: none"> <u>1. The level of nitrogen discharge form the site, or new sites in the case of a subdivided property.</u> <u>2. The term of the resource consent.</u> <u>3. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent to demonstrate and/or</u> 	
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			<p><u>monitor compliance with the Farm Environment Plan.</u></p> <p><u>Notification:</u> <u>Consent applications will be considered without notification, and without the need to obtain written approval of affected persons.'</u></p>	
		V1PC1-570	<p>Rules 3.11.5 Support</p> <p>ADD a NEW rule to read: <u>'3.11.5.5A Controlled Activity Rule –Transfer of Commercial Vegetable Production Activity</u> <u>The diffuse discharge of nitrogen, phosphorous, sediment and microbial pathogens from commercial vegetable production onto or into land in circumstances which may result in those contaminants entering water where that commercial vegetable production activity has been legally established on a parent property and is transferring the activity to a new property in the same sub-catchment shall be a controlled activity, subject to the following standards and terms:</u></p> <ol style="list-style-type: none"> 1. <u>The parent property and the new property are registered with the Waikato Regional Council in conformance with Schedule A, and</u> 2. <u>A Nitrogen Reference Point for the commercial vegetable production activity at the parent property has been calculated in conformance with Schedule B and the proposed commercial vegetable production activity at the new property is of an intensity and scale that does not result in the Nitrogen Reference Point value of the activity as undertaken</u> 	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>at the parent property being exceeded, as measured by the five year rolling average annual nitrogen loss determined by the current version of OVERSEER®.</u></p> <ol style="list-style-type: none"> 3. <u>The use of the area of land on the new property for farming activities and the associated diffuse discharge of nitrogen, phosphorous, sediment and microbial pathogens onto or into that area of land in circumstances which may result in those contaminants entering water is ceased prior to the commencement of the commercial vegetable production activity on that same area of land.</u> 4. <u>A Farm Environment Plan for the property or enterprise prepared in conformance with Schedule 1 and approved by a Certified Farm Environment Planner is provided to the Waikato Regional Council at the time the resource consent application is lodged.</u> 5. <u>The use of land shall be undertaken generally in accordance with the actions and timeframes specified in the Farm Environment Plan.</u> <p><u>Matters of Control</u></p> <ol style="list-style-type: none"> i. <u>The term of the resource consent.</u> ii. <u>The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent to demonstrate and/or monitor compliance with the Farm Environment Plan.</u> <p><u>Notification:</u> <u>Consent applications will be considered without notification, and without the need to obtain written approval of affected persons.'</u> OR AMEND Rule 3.11.5.5A to provide for the</p>	
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			transfer within parts of sub-catchments or zones, or among a group of related sub-catchments AND/OR in the event that Rule 3.11.5.6 does not reasonably provide for an alternative land use to establish on the parent property after the commercial vegetable grower leaves, AMEND the policies, Rule 3.11.5.5A and/or Rule 3.11.5.6 so that it does.	
		V1PC1-571	<p>Rules 3.11.5 Support</p> <p>ADD a NEW section, Information Requirements, before Rule 3.11.5.6 to read: '<u>Information Requirements - Controlled Activities Applications for a Controlled Activity under either Rules 3.11.4, 3.11.4A 3.11.5.5 or 3.11.5.5A shall, at minimum, provide the following information:</u></p> <p><u>a. A Farm Environment Plan prepared in conformance with Schedule 1 along with evidence of approval of the Farm Environment Plan by a Certified Farm Environment Planner; and</u></p> <p><u>b. Evidence of the registration of the property with the Waikato Regional Council in conformance with Schedule A; and c. A Nitrogen Reference Point for the property or enterprise in conformance with Schedule B; and</u></p> <p><u>d. Information explaining how Schedule C will be complied with.'</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-708	<p>Rules 3.11.5 Support</p> <p>ADD a NEW section to read: '<u>Information Requirements - Restricted</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points

			<p><u>Discretionary and Discretionary Activities Applications for a Restricted Discretionary Activity under Rule 3.11.5.6 or a Discretionary Activity under Rule 3.11.5.7 shall, at minimum, provide the following information:</u></p> <p><u>a. An analysis of the Most Practicable Actions to manage the discharge of nitrogen, phosphorous, sediment and microbial pathogens on a proportional basis that will be implemented by the operator of the farm enterprise; and</u></p> <p><u>b. A description of the monitoring, record keeping, reporting and information provision methods that will be implemented by the consent holder to ensure efficient and effective communication with the Waikato Regional Council on consent related matters; and</u></p> <p><u>c. Where consent is sought to allow an exceedance of permitted or controlled activity nitrogen limits, an analysis and description of how the risks associated with discharges from the farm enterprise of phosphorous, sediment and microbial pathogen onto or into land in circumstances which may result in those contaminants entering water can be reasonably managed; and</u></p> <p><u>d. Information setting out the value of existing investment in the farming enterprise to which the consent application relates.'</u></p>	<p>made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		ViPC1-327	<p>Rule 3.11.5.1 Support with amendments</p> <p>RETAIN Rule 3.11.5.1(1) on the basis that the submitter's proposed changes to Schedule A are accepted.</p> <p>IF the amendments to Schedule A are not accepted THEN AMEND 3.11.5.1(1) to address its</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the</p>

			<p>concerns. DELETE and REPLACE Rule 3.11.5.1(2) with the following: '<u>The stock exclusion and setback requirements in Schedule C are and/or will be complied with; and</u>' AND AMEND Rule 3.11.5.1(4) to read: 'The farming activities do not form part of an enterprise being undertaken on more than one property where the combined area is no greater than 4.1ha; or' AND AMEND Rule 3.11.5.1(5) to read: 'For grazed land, the stocking rate of land is less than 69 stock units per hectare; and' OR AMEND to a reasonable stocking rate that adequately addresses likely water quality risks while providing for low intensity farms to operate under Rule 3.11.5.1.</p>	<p>submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-338	<p>Rule 3.11.5.2 Oppose with amendments</p> <p>DELETE and REPLACE Rule 3.11.5.2(2) with the following: '<u>The stock exclusion and setback requirements in Schedule C are and/or will be complied with; and</u>' AND AMEND Rule 3.11.5.2(3)(b) to read: '<u>The land use has</u> Where the land is: i. used for grazing livestock, the stocking rate of the land is no greater than the same stocking rate <u>as it had on of the land at 22 October 2016 (where the land is used for grazing livestock);</u> or ii. not used for grazing livestock, the land use has the same or lower diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens as the land use at 22 October 2016 <u>(irrespective of whether the land is used for grazing livestock);</u> and'</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>AND REPLACE Rule 3.11.5.2(3)(e) with the following: <u>'Upon request from the Council, the following information is provided to the Council, in respect of the 12 month period prior to the date of the request:</u></p> <ul style="list-style-type: none"> <u>i. Annual stock numbers; and</u> <u>ii. Annual fertiliser use; and</u> <u>iii. Annual brought in animal feed.'</u> <p>AND AMEND Rule 3.11.5.2(4)(b) to read: 'The diffuse discharge of nitrogen from the property or enterprise does not exceed either:</p> <ul style="list-style-type: none"> i. the Nitrogen Reference Point; or ii. 15kg nitrogen/hectare/year; <p>whichever is the lesser, over the whole property or enterprise when assessed in accordance with Schedule B; and'</p> <p>OR AMEND to adopt a permitted baseline for properties over 20 hectares that is not based on nitrogen but is based on a stocking rate of 16 stock units per hectare AND/OR a narrative about farm system types that captures low intensity farms and provides flexibility for their nitrogen to increase as a permitted activity.</p> <p>AND REPLACE Rule 3.11.5.2(4)(c) with the following: <u>'The stock exclusion and setback requirements in Schedule C are complied with'</u></p> <p>AND REPLACE Rule 3.11.5.2(4)(d) with the following: <u>'Upon request, evidence is provided to the Council demonstrating compliance with paragraph (b) as measured by the five-year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER; and'</u></p> <p>AND REPLACE Rule 3.11.5.2(4)(e) with the following: <u>'A simplified Farm Environment Plan which has been prepared in accordance with Schedule 1A and has been approved by a</u></p>	
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			<p><u>Certified Farm Environment Planner is provided to Waikato Regional Council; and'</u> AND ADD the following paragraphs to Rule 3.11.5.2(4): '<u>f. The use of land shall be undertaken generally in accordance with the actions and timeframes specified in the Simplified Farm Environment Plan; and</u> <u>g. The Simplified Farm Environment Plan may be amended in accordance with the procedure set out in Schedule 1A and the use of land shall thereafter be undertaken in accordance with the amended plan; and</u> <u>h. A copy of the Simplified Farm Environment Plan amended in accordance with condition g above shall be provided to the Waikato Regional Council within 30 working days of the date of its amendment.'</u> AND DELETE Rule 3.11.5.2(5).</p>	
		V1PC1-357	<p>Rule 3.11.5.3 Support with amendments</p> <p>DELETE and REPLACE Rule 3.11.5.3(3) with the following: '<u>The stock exclusions and setback requirements in Schedule C are and/or will be complied with; and'</u> AND AMEND Rule 3.11.5.3(5)(c) to read: '<u>By July 2026 <u>March 2028</u> for properties or enterprises within Priority 3 sub- catchments listed in Table 3.11-2; and'</u> AND/OR ENSURE that the time period available for implementation for FEPs is taken into account when reviewing Chapter 3.11. OR AMEND all dates and timeframes to provide a reasonable opportunity to obtain a FEP (when the rules are operative) and a reasonable timeframe to assess 10 year progress.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>AND ADD a NEW paragraph (6), (7) and (8) to Rule 3.11.5.3 to read:</p> <p><u>'6. The diffuse discharge of nitrogen from the property or enterprise, as measured by the five-year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER®, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified; and</u></p> <p><u>7. Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures are proposed in the Farm Environment Plan to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 March 2028.</u></p> <p><u>8. If the property is subdivided, a new Nitrogen Reference Point shall be calculated for all of the lots created by the subdivision in conformance with Schedule B for each individual lot.'</u></p> <p>AND AMEND rule 3.11.5.3(6) to read: '69. The use of land shall be undertaken generally in accordance with the actions and timeframes specified in the Farm Environment Plan; and'</p> <p>AND AMEND the numbering of paragraphs (7) and (8) to (10) and (11) respectively.</p>	
		V1PC1-468	<p>Rule 3.11.5.4</p> <p>Oppose with amendments</p> <p>AMEND Rule 3.11.5.4 to read:</p> <p>1. '1 January 2020 1 September 2021 1 <u>March 2022</u> for properties or enterprises in Priority 1 sub-catchments listed in</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the</p>

			<p>Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</p> <ol style="list-style-type: none"> 2. 1 January 2023 <u>1 September 2024</u> 1 March 2025 for properties or enterprises in Priority 2 sub-catchments listed in Table 3.11-2; 3. 1 January 2026 <u>1 March 2028</u> for properties or enterprises in Priority 3 sub-catchments listed in Table 3.11-2;' <p>AND ADD the following NEW paragraphs to Rule 3.11.4.4(5) to read:</p> <p><u>'d. The diffuse discharge of nitrogen from the property or enterprise, as measured by the five-year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER®, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified; and</u></p> <p><u>e. Where the Nitrogen Reference Point exceed the 75th percentile nitrogen leaching value, actions, timeframes and other measures are proposed to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2028; and'</u></p> <p><u>'f. If the property is subdivided, a new Nitrogen Reference Point shall be calculated for all of the lots created by the subdivision in conformance with Schedule B for each individual lot.'</u></p> <p>'d- <u>g. The stock exclusion and setback requirements in Schedule C are complied with Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C.'</u></p>	<p>submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p><u>'h. The use of land shall be undertaken generally in accordance with the actions and timeframes specified in the Farm Environment Plan; and</u></p> <p><u>i. The Farm Environment Plan provided under condition e. may be amended in accordance with the procedure set out in Schedule 1 and the use of land shall thereafter be undertaken in accordance with the amended plan; and</u></p> <p><u>j. A copy of the Farm Environment Plan amended in accordance with condition f. shall be provided to the Waikato Regional Council within 30 working days of the date of its amendment.'</u></p> <p>AND DELETE the matters of control (i)-(iv). AND RETAIN matter of control (v). AND RETAIN AND AMEND matter of control (vi) to read: 'The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent to demonstrate and/or monitor <u>the use of land generally in accordance with the Farm Environment Plan.</u>'</p> <p>AND DELETE matters of control (vii) and (viii). AND/OR AMEND the timeframe for assessing progress to 10 years. OR take into account the time period for implementation of FEP actions when assessing progress made at 2026. OR AMEND all dated and timeframes to provide a reasonable opportunity to obtain a FEP and a reasonable timeframe to assess 10 year progress.</p>	
		V1PC1-498	<p>Rule 3.11.5.5 Oppose with amendments</p> <p>AMEND the date in the first paragraph of Rule 3.11.5.5 to 1 March 2022.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points</p>

			<p>AND ADD a NEW paragraph (c) to Rule 3.11.5.5 to read: '<u>c. The diffuse discharge of nitrogen from the property or enterprise, as measured by the five-year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER, does not increase beyond the property or enterprises Nitrogen Reference Point, unless other suitable mitigations are specified; and</u>'</p> <p>AND AMEND Rule 3.11.5.5(c) to read: '<u>ed. The stock exclusion and setback requirements in Schedule C are and/or will be complied with Cattle horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and</u>'</p> <p>AMEND paragraph d[e] of Rule 3.11.5.5 to read: '<u>de. The land use is registered to a Certified Industry Scheme if the applicant wishes to be part of a Certified Industry Scheme; and</u>'</p> <p>AND ADD three NEW paragraphs, (j), (k)[l] and (l) to Rule 3.11.5.5 to read:</p> <p><u>'j. The use of land shall be undertaken generally in accordance with the actions and timeframes specified in the Farm Environment Plan; and</u></p> <p><u>k[l]. The Farm Environment Plan provided under condition h. may be amended in accordance with the procedure set out in Schedule 1 and the use of land shall thereafter be undertaken in accordance with the amended plan; and</u></p> <p><u>l. A copy of the Farm Environment Plan amended in accordance with condition j. shall be provided to the Waikato Regional Council within 30 working days of the date of its amendment.'</u></p> <p>AND DELETE the Matters of control (i)-(iv). AND RETAIN matter of control (v). AND RETAIN AND AMEND matter of control (vi) to read: 'The monitoring, record keeping,</p>	<p>made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p>reporting and information provision requirements for the holder of the resource consent to demonstrate and/or monitor <u>the use of land generally in accordance</u> compliance with the Farm Environment Plan.</p> <p>AND DELETE matters of control (vii)-(viii).</p> <p>AND AMEND the advisory note to read: 'Under section 20A(2) of the RMA a consent must be applied for within 6 months of 1 January 2020 1 September 2021 <u>1 March 2022</u>, namely by 1 July 2020 1 March 2022 <u>1 September 2022</u>.'</p> <p>AND AMEND Rule 3.11.5.5 to provide for subdivision on the same or similar terms as contained in Rules 3.11.5.3. and 3.11.5.4.</p> <p>OR ADD a NEW permitted activity rule for commercial vegetable growing that is registered to a certified industry scheme on the same or similar terms and conditions as Rule 3.11.5.3.</p> <p>OR AMEND the timeframe for assessing progress to 10 years</p> <p>OR AMEND to take into account the time period for implementation of FEP actions when assessing progress made at 2026</p> <p>OR AMEND all dates and timeframes to provide a reasonable opportunity to obtain a FEP and a reasonable timeframe to assess 10 year progress.</p>	
		V1PC1-572	<p>Rule 3.11.5.6</p> <p>Oppose with amendments</p> <p>AMEND Rule 3.11.5.6 to read: 'The use of land for farming... terms of Rule 3.11.5.1 to 3.11.5.5A and the associated...'</p> <p>AND AMEND Rule 3.11.5.6(i) to read: 'Cumulative effects <u>of the farm enterprise</u> on water quality of the <u>sub-catchment within which</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be</p>

			<p><u>the farming activity occurs and, where relevant, the wider catchment of the Waikato and Waipā Rivers'</u></p> <p>AND AMEND Rule 3.11.5.6(ii) to read: 'ii. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens <u>from the farm enterprise, taking into account:</u> <u>(a) the relative proportion of nitrogen, phosphorus, sediment and microbial pathogens that the particular discharge contributes to the catchment load; and</u> <u>(b) the characteristics of the sub-catchment within which the subject farming enterprise is located as set out in the relevant Sub-catchment Management Plan and Catchment Profile produced by Waikato Regional Council; and</u> <u>(c) the scale and significance of the risk from each contaminant discharge to the achievement of the values and uses for the Waikato and Waipā Rivers;</u> <u>(d) the relative contribution of the industry sector within which the farming enterprise belongs to the likely achievement of the short term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision & Strategy referred to in Objective 1; and</u> <u>(e) the resources reasonably available to the farming enterprise.'</u></p> <p>AND AMEND Rule 3.11.5.6.(iii) to read: 'The need for and content of a Farm Environment Plan <u>including the significance of any failure to comply with Schedule 1 in the context of the matters listed in paragraph ii above.'</u></p> <p>AND ADD a new paragraph (vii) to read: '<u>If the property is subdivided, the Nitrogen Reference Point for all of the lots created by the subdivision by reference to the significance of any failure to</u></p>	<p>allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p><u>comply with Schedule B for each individual lot in the context of the matters referred to in paragraph ii above.</u></p> <p>AND AMEND Rule 3.11.5.6(vii) to read: 'vii <u>viii</u>. The <u>significance of any failure to address or comply with the matters addressed by</u> [contained in] Schedules A, B and C, <u>in the context of the matters listed in paragraph ii above.</u>'</p>	
		PC1-10845	<p>Rule 3.11.5.7 Oppose the provision with amendments</p> <p>AMEND PPC1 so that land users are able to modify their production systems within present general land uses as a permitted activity, with the proviso that nitrogen discharge does not exceed 15kgN/ha across the production unit as a whole, and that vegetable production is exempt from the general nutrient discharge restrictions.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-706	<p>Rule 3.11.5.7 Oppose with amendments</p> <p>AMEND Rule 3.11.5.7 to read: 'Rule 3.11.5.7 - Non-Complying Discretionary Activity Rule - Land Use Changewithin 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... is a non-complying discretionary activity (requiring resource consent) until 1 July 2026.'</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific

			AND DELETE everything after the comma in the section 'notification'.	decisions sought by WPL in its own submissions.
		PC1-10850	<p>Schedule B Oppose the provision with amendments</p> <p>AMEND Schedule B to ensure that the purpose for which information is being sought is clearly stated.</p> <p>AND ENSURE that it is within Councils powers to seek all of the information sought in Schedule B</p> <p>AND ENSURE that the information sought by Council is no more than is necessary to achieve the purposes for which it is sought</p> <p>AND ENSURE that the requirements set out in Schedule B match the Policies, Methods, definitions, etc. to which Schedule B relates.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-717	<p>Schedule B Support with amendments</p> <p>AMEND Schedule B(a) to read: 'The Nitrogen Reference Point must be calculated by a Certified Farm Nutrient Advisor to determine <u>estimate</u> the amount of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point shall be determined <u>identified</u> through the Rule 3.11.5.7 consent process.'</p> <p>AND AMEND Schedule B(b) to read: 'The Nitrogen Reference Point ... during the reference period <u>(and where the property was not used for</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p><u>commercial vegetable growing during that entire period, it shall be the average annual nitrogen leaching for the period it was used for commercial vegetable growing and also within the period specified in clause f).</u>'</p> <p>OR AMEND to provide for all farming activities (including commercial vegetable production) to be measured as the highest annual nitrogen leaching loss in a single 12 month period.</p> <p>AND AMEND Schedule B(c) to read: 'The Nitrogen Reference Point must be calculated using the current version of the OVERSEER Model approved by the Chief Executive of the Waikato Regional Council <u>or an alternative model or OVERSEER versions approved by the Chief Executive of the Waikato Regional Council.</u>'</p> <p>OR AMEND PPC1 to set out the assessment criteria for consideration of alternative models to Overseer.</p> <p>OR AMEND to provide for Waikato Regional Council to develop guidelines or assessment criteria that sit outside PPC1. AND AMEND Schedule B(d) to read: 'The Nitrogen Reference Point data...OVERSEER Best Practice Data Input Standards 2016 <u>(unless approval is obtained from the Chief Executive of the Waikato Regional Council to use alternative standards)</u>, with the exceptions and inclusions set out in Schedule B Table 1.'</p> <p>OR AMEND the policies and methods to provide guidance and a reasonable basis for calculating the missing data where properties do not have sufficient data for the benchmark years.</p> <p>AND AMEND Schedule B(e) to read: 'The Nitrogen Reference Point and the Nitrogen Reference Point data must be provided to...'</p> <p>AND AMEND Schedule B(f) to read: 'The</p>	
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			<p>reference period is the two <u>ten</u> financial years covering 2014/2015 and 2005/2006 to 2015/2016...'</p> <p>AND AMEND Schedule B(g) to read: 'The following records (where relevant to the land use undertaken on the property or enterprise) must be retained <u>for a period of seven years</u> and provided to Waikato Regional Council at its request:'</p> <p>AND ADD a NEW paragraph (h) to Schedule B to read: '<u>The Nitrogen Reference Point must be calculated using the data input methodology contained in Table 1, except where reliable actual data is available that can be used in substitution for Overseer defaults or where approval is obtained from the Chief Executive of the Waikato Regional Council for deviation from the Overseer parameter setting.</u>'</p> <p>AND AMEND Table 1 to allow farmers to provide actual data where it is readily available.</p> <p>AND AMEND Schedule B to provide the option of deviating from the OVERSEER Model parameter setting where approval is obtained from Waikato Regional Council.</p> <p>AND AMEND the heading of the second column of Schedule B Table 1 to read: 'Setting that must be used <u>(unless otherwise provided for in Chapter 3.11).</u>'</p> <p>AND AMEND the second column for the 'missing data' parameter to read: 'In the absence of Nitrogen Referencing information being provided the Waikato Regional Council will use the appropriate default numbers for any necessary inputs to the OVERSEER Model. <u>{Where the default numbers are not available or are not a reasonable proxy for the farming activity, the activity will receive the average value for that</u></p>	
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			<u>input for the same farming activity in the same</u> such default numbers will generally be around 75% of normal Freshwater Management Unit^ or sub-catchment average values for those inputs).	
		PC1-10854	Schedule 1 Oppose the provision with amendments AMEND Schedule 1 to ensure that the purpose for which information is being sought is clearly stated AND ENSURE that it is within Councils powers to seek all of the information sought in Schedule 1 AND ENSURE that the information sought by Council is no more than is necessary to achieve the purposes for which it is sought AND ENSURE that the requirements set out in Schedule 1 match the policies, methods, definitions, etc. to which Schedule 1 relates.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-766	Schedule 1 Oppose with amendments AMEND Schedule 1 to read: A Farm Environment Plan shall be prepared in accordance with the requirements of A <u>set out</u> below. The Farm Environment Plan shall be certified as meeting the requirements of A Schedule 1 by a Certified Farm Environment Planner. The Farm Environment Plan shall identify all sources of sediment, nitrogen, phosphorus and microbial pathogens, and identify actions, and timeframes for those actions to be completed, in order to reduce the diffuse discharges of these contaminants.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>The Farm Environment Plan must clearly identify how specified minimum standards will be complied with. The requirements set out in A <u>below</u> apply to all Farm Environment Plans, including those prepared within a Certified Industry Scheme.</p> <p>This schedule applies to all farming activities that require a Farm Environment Plan, but it is acknowledged that some provisions will not be relevant to every farming activity.</p> <p><u>Purpose of a Farm Environment Plan</u> <u>The purpose of a Farm Environment Plan is to identify the Most Practicable Action for the management of diffuse discharges from the farm enterprise of nitrogen, phosphorous, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water in order to assist with achieving the short term targets^ in Objective 3 or making progress towards the outcomes anticipated by the Vision & Strategy and the values^ referred to in Objective 1.</u> <u>For the purposes of a Farm Environment Plan, Most Practicable Action means the combination, priority and timing of actions to manage the discharge of contaminants from the farm enterprise that:</u></p> <ul style="list-style-type: none"> <u>a. recognises and provides for the characteristics of the sub-catchment within which the subject farming enterprise is located as set out in the relevant Sub-catchment Management Plan and Catchment Profile produced by Waikato Regional Council; and</u> <u>b. corresponds to the scale and significance of the risk from the discharge of each contaminant from the farm enterprise to the likely</u> 	
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			<p><u>achievement of the short term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision & Strategy and values^ referred to in Objective 1; and</u> <u>c. takes account of the relative contribution of the industry sector within which the farm enterprise belongs to the likely achievement of the short term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision & Strategy referred to in Objective 1; and</u> <u>d. takes account of the resources reasonably available to the farm enterprise</u></p> <p><u>Content of a Farm Environment Plan</u> <u>To the extent that it is applicable to the particular farm enterprise, a Farm Environment Plan shall contain:</u></p> <p>A. Farm Environment Plans shall contain as a minimum:</p> <p>1. The property or enterprise details: (a) Full name, address and contact details (including email addresses and telephone numbers) of the person responsible for the property or enterprise. (b) Trading name (if applicable, where the owner is a company or other entity). (c) A list of land parcels which constitute the property or enterprise: (i) the physical address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and (ii) The legal description of each parcel of land.</p> <p><u>2. Unless accompanied by a resource consent</u></p>	
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			<p><u>under Rule 3.11.5.4A, 3.11.5.6 or 3.11.5.7, or in the case of Schedule C appropriately addressed by an alternative mechanism as part of the assessment in paragraph 3, information to demonstrate compliance with Schedule B (Nitrogen Reference Point) and Schedule C (Stock Exclusion and Setbacks).</u></p> <p>2. An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the farming activities on the property, and the priority of those identified risks, having regard to sub-catchment targets in Table 3.11-1 and the priority of lakes within the sub-catchment. As a minimum, the risk assessment shall include (where relevant to the particular land use):</p> <p>(a) A description of where and how stock shall be excluded from water bodies for stock exclusion including:</p> <p>(i) the provision of fencing and livestock crossing structures to achieve compliance with Schedule C; and</p> <p>(ii) for areas with a slope exceeding 25 mitigation measures, and where stream fencing is impracticable, the provision of alternative</p> <p>(b) A description of setbacks and riparian management, including:</p> <p>(i) The management of water body margins including how damage to the bed and margins of water bodies, and the direct input of contaminants will be avoided, and how riparian margin settling and filtering will be provided for; and</p> <p>(ii) Where practicable the provision of minimum grazing setbacks from water bodies for stock exclusion of 1 metre for land with a slope of less than 15 and 3 metres for land with a slope</p>	
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			<p>between 15 and 25; and (iii) The provision of minimum cultivation setbacks of 5 metres. (e)3. A description of the critical source areas from which <u>diffuse discharges of sediment, nitrogen, phosphorus and microbial pathogens associated with the farm enterprise</u> are lost, <u>and identification of the Most Practicable Action</u> including: (i) (a) the identification of <u>any</u> intermittent waterways, overland flow paths and areas prone to flooding and ponding <u>within the critical source areas</u>, and an assessment of <u>opportunities to minimise losses from these areas through the Most Practicable Action to manage any risks from the critical source areas. Such actions could include</u> appropriate stocking policy, stock exclusion and/or measures to detain floodwaters and settle out or otherwise remove sediment, nitrogen, phosphorus and microbial pathogens (e.g. detention bunds, sediment traps, natural and constructed wetlands); and (ii) (b)the identification of any actively eroding areas, erosion prone areas, and areas of bare soil <u>within the critical source areas within the critical source areas, as well as any erosion or sediment loss from cultivation within the critical source areas</u>, and <u>appropriate measures an assessment of the Most Practicable Action any for erosion and sediment control. and Actions could include</u> re-vegetation; and (iii) (c) an assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens from any tracks and races and livestock crossing structures to waterways <u>within the critical source areas</u>, and <u>the identification of appropriate measures to</u></p>	
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			<p>minimise an assessment of the Most Practicable Action to reduce any of these discharges. Actions could include (e.g. cut-off drains, and shaping); and</p> <p>(iv) (d) the identification of <u>any</u> areas where effluent accumulates including yards, races, livestock crossing structures, underpasses, stock camps, and feed-out areas <u>within the critical source areas</u>, and appropriate measures to minimise the risk of an assessment of the Most Practicable Action to reduce any risk of diffuse discharges of contaminants from these areas to groundwater or surface water; and</p> <p>(v) (e) the identification of <u>any</u> other 'hotspots' such as fertiliser, silage, compost, or effluent storage facilities, wash- water facilities, offal or refuse disposal pits, and feeding or stock holding areas, and the appropriate measures to minimise an assessment of the Most Practicable Action to reduce the risk of diffuse discharges of <u>any</u> contaminants from these areas to groundwater or surface water; <u>and</u></p> <p><u>(f) a description of any systems for managing collected animal effluent and freshwater irrigation, including the Most Practicable Action to reduce any risk of contaminants from these areas or the use of these systems to groundwater or surface water.</u></p> <p>(d) An assessment of appropriate land use and grazing management for specific areas on the farm in order to maintain and improve the physical and biological condition of soils and minimise the diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens to water bodies, including:</p> <p>(i) matching land use to land capability; and</p> <p>(ii) identifying areas not suitable for grazing; and</p>	
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			<p>(iii) stocking policy to maintain soil condition and pasture cover; and (iv) the appropriate location and management of winter forage crops; and (v) suitable management practices for strip grazing. (c) A description of nutrient management practices including a nutrient budget for the farm enterprise calculated using the model OVERSEER in accordance with the OVERSEER use protocols, or using any other model or method approved by the Chief Executive Officer of Waikato Regional Council. (f) A description of cultivation management, including: (i) The identification of slopes over 15 and how cultivation on them will be avoided; unless contaminant discharges to water bodies from that cultivation can be avoided; and <u>4. For cultivation on land with slopes greater than 25°, assessment of the Most Practicable Action to mitigate any</u> (ii) How the adverse effects of cultivation on slopes of less than 15 degrees will be mitigated <u>including</u> through appropriate erosion and sediment controls for each paddock that will be cultivated including by: (a) assessing where overland flows enters and exits the paddock in rainfall events; and (b) identifying appropriate measures to divert overland flows from entering the cultivated paddock; and (c) identifying measures to trap sediment leaving the cultivated paddock in overland flows; and (d) maintaining appropriate buffers between cultivated areas and water bodies (minimum 5m setback). (e) A description of collected animal effluent</p>	
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			<p>management including how the risks associated with the operation of effluent systems will be managed to minimise contaminant discharges to groundwater or surface water.</p> <p>(f) A description of freshwater irrigation management including how contaminant loss arising from the irrigation system to groundwater or surface water will be minimised.</p> <p>3 <u>5</u>. A spatial risk map(s) at a scale that clearly shows:</p> <p>(a) The boundaries of the property; and</p> <p>(b) The locations of the main land uses(6) that occur on the property; and</p> <p>...</p> <p>(g) The location of critical source areas for contaminants, as identified in 2-(e) <u>3</u> above.</p> <p>4 A description of the actions that will be undertaken in response to the risks identified in the risk assessment in 2 above (having regard to their relative priority) as well as where the mandatory time bound actions will be undertaken, and when and to what standard they will be completed.</p> <p><u>6. Assessment of the risk of how known natural hazards and/or climate change may affect farming activities on the property, including commentary on how the occurrence of the known natural hazard could foreseeably alter the Most Practicable Actions outlined in the Farm Environment Plan.</u></p> <p>5-7. A description of the following:</p> <p><u>(a) actions that are intended to be undertaken in response to any risks identified in the Farm Environment Plan (having regard to their relative priority and significance) as well as where the time-bound actions are intended to be undertaken, and when and to what standard they</u></p>	
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			<p><u>are intended to be completed; and</u> (a) (b) Actions, timeframes and other measures to ensure that the diffuse discharge of nitrogen from the property or enterprise, as measured by the five-year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER <u>current at the time at the time of preparation of the Farm Environment Plan</u> does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified <u>or consent is obtained under Rule 3.5.11.4A or 3.5.11.6 or 3.5.11.7;</u> (b) (c) Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th nitrogen leaching value by 1 July 2026 2028, except in the case of Rule 3.11.5.5, <u>Rule 3.11.5.6 or Rule 3.11.5.7.</u> Vegetable growing minimum standards Farm environment plans required under Rule 3.11.5.5 <u>or 3.11.5.5A</u> shall, in addition to the matters set out above, ensure the following matters are addressed ... <u>Process for Amending and/or Reviewing a Farm Environment Plan</u> <u>Farm Environment Plans can be amended and/or reviewed at the request of the farmer, or by way of review initiated by Waikato Regional Council in accordance with the process set out below.</u> <u>Triggers for amending/reviewing a Farm Environment Plan may include (but are not limited to)[1]:</u> a) <u>At the direction of Council or a Certified Industry Scheme;</u></p>	
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			<p><u>b) Where a farmer transfers between Certified Industry Schemes or to a consented activity;</u> <u>c) Where there has been a material change in on farm risk or circumstances that would require changes to the mitigation actions within the Farm Environment Plan.</u> <u>Farmer or Industry Scheme Initiated Amendments</u> <u>Farmer initiated amendments to a Farm Environment Plan must be approved by a Certified Farm Environment Planner (“CFEP”). Any amendments shall remain consistent with the overall purpose and intent of the relevant Farm Environment Plan, and be prepared in the manner set out previously in this Schedule without the need to apply for a change to consent condition under the RMA.</u> <u>d) Amendments to a Farm Environment Plan approved by a CFEP must be provided to Waikato Regional Council within 30 working days of the amendment being approved in writing by the CFEP. A copy of the latest approved version of a Farm Environment Plan for a farming activity shall be available from the Waikato Regional Council on-line portal at all times.</u> <u>Council Initiated reviews</u> <u>Waikato Regional Council may every five (5) years after the date of approval of a FEP, serve notice on the Farm Environment Plan holder of its intention to review any or all of the content of the Farm Environment Plan for any of the following purposes:</u> <u>a. To address situations where the Farm Environment Plan actions are not achieving the intended environmental outcomes envisaged by the Farm Environment Plan.</u> <u>b. To address situations where environmental or</u></p>	
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			<p><u>other circumstances (e.g. technology) change and as result the Most Practical Actions set out in the Farm Environment Plan require review. The matters that require attention will be advised to the Farm Environment Plan holder in writing by Waikato Regional Council within 10 working days of the completion of the review. Upon receipt of such notification the Farm Environment Plan holder will engage a CFEP to prepare a new or amended Farm Environment Plan at the farmer's cost to address matters identified in the review.</u></p> <p><u>Dispute Resolution</u> <u>Any dispute or difference arising out of or in relating the approval of or amendments to a Farm Environment Plan may be referred to mediation, a non-binding dispute resolution process in which an independent mediator facilitates negotiation between the parties. Mediation may be initiated by either party writing to the other party and identifying the dispute which is being suggested for mediation. The other party will either agree to proceed with mediation or agree to attend a preliminary meeting with the mediator to discuss whether mediation would be helpful in the circumstances. The parties will agree on a suitable person to act as mediator or will ask the Arbitrators' and Mediators' Institute of New Zealand Inc. to appoint a mediator. The mediation will be in accordance with the Mediation Protocol of the Arbitrators' and Mediators' Institute of New Zealand Inc."</u></p> <p><u>The mediation shall be terminated by –</u> <u>(a) The signing of a settlement agreement by the parties; or</u></p>	
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			<p><u>(b) Notice to the parties by the mediator, after consultation with the parties, to the effect that further efforts at mediation are no longer justified; or</u> <u>(c) Notice by one or more of the parties to the mediator to the effect that further efforts at mediation are no longer justified; or</u> <u>(d) The expiry of sixty (60) working days from the mediator's appointment, unless the parties expressly consent to an extension of this period. If no mediation is agreed to or if the mediation should be terminated as provided in (b), (c) or (d), any dispute or difference arising out of or relating to the approval of or amendments to a Farm Environment Plan, shall be referred to and finally resolved by arbitration in New Zealand in accordance with New Zealand law and the current Arbitration Protocol of the Arbitrators' and Mediators' Institute of New Zealand Inc. The arbitration shall be by one arbitrator to be agreed upon by the parties and if they should fail to agree within twenty-one (21) days, then to be appointed by the President of the Arbitrators' and Mediators' Institute of New Zealand Inc.</u> <u>[1] Reference should be made to the Waikato Regional Council Farm Environment Plan Guidance Document for further information on the circumstances that may generate an amendment to a Farm Environment Plan.'</u> OR AMEND paragraph 7(b) to adopt a reasonable, transparent and fair way of adopting Overseer version changes that maintains relativity between the NRP and the current discharge.</p>	
		PC1-10860	Table 3.11-1 Oppose the provision with amendments	WPL supports and opposes the

			<p>AMEND Table 3.11-1 to bring it into line with the requirements of the National Policy Statement for Freshwater Management</p> <p>AND ADD a column containing the current attribute levels for each site to Table 3.11-1.</p>	<p>submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-783	<p>Table 3.11-1 Oppose with amendments</p> <p>DELETE the word 'directly' from the second-to-last sentence of the paragraph under the section 'Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipā River catchments' on page 63.</p> <p>AND REMOVE the 80 year targets from Table 3.11-1 and ADD the current state for each attribute.</p> <p>AND REMOVE any identified 'spikes' in the current attribute state data.</p> <p>OR AMEND the short term targets in Table 3.11-1 to achieve realistic and reliable targets based on reasonable assumptions that address the concerns raised in this submission.</p> <p>OR AMEND the short term targets so that they are based on NOF bands rather than specific numbers.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-785	<p>Table 3.11-1 Oppose with amendments</p>	<p>WPL supports and opposes the</p>

			<p>AMEND the explanatory note to Table 3.11-1 to read: 'The tables set out the concentrations (all attributes except clarity) or visibility distance (clarity attribute) to be achieved by actions taken in the short term and <u>provides a comparison with the current state (based on 2010-2014 monitoring data) at 80 years for rivers and tributaries, and at 80 years for lakes FMUs.</u> Where water quality is currently high (based on 2010-2014 monitoring data) the short term and 80-year targets will be the same as the current state. and there is to be no decline in quality (that is, no increase in attribute concentration or decrease in clarity). Where water quality needs to improve (<u>based on 2010-2014 monitoring data</u>), the <u>values to be achieved at a site indicate a short term targets indicate that a and long term</u> reduction in concentration or increase in clarity <u>is required</u> compared to the current state. For example, at Otamakokore Stream, Upper Waikato River FMU:</p> <ul style="list-style-type: none"> • the current state value for median nitrate is 0.740 mgNO₃-N/L. The short term and 80-year targets are <u>is</u> set at 0.740 mgNO₃-N/L. <u>It is in the A band for median nitrate and must maintain within that band.</u> to reflect that there is to be no decline in water quality • the current state value for E.coli is 696 E.coli/100ml. The 80-year target is 540 E.coli/100ml and the short term target is set at <u>680 E.coli/100ml to recognise the improvement needed in the first 10 years.</u> 10% of the difference between the current state value and the 80-year target. 	<p>submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p>The achievement of the attribute targets in Table 3.11-1 will be determined through analysis of 5-yearly monitoring data <u>as adjusted for any anomalies e.g. one off spikes</u>. The variability in water quality (such as due to seasonal and climatic events) and the variable response times of the system to implementation of mitigations may mean that the targets are not observed for every attribute at all sites in the short term. <u>It is likely that</u> the effect of some contaminants (particularly nitrogen) discharged from land <u>in recent years</u> has not yet been seen in the water. This means that in addition to reducing discharges from current use and activities, further reductions will <u>may</u> be required to address the load to come that will <u>may</u> contribute to nitrogen loads in the water. There are time lags between contaminants discharged from land uses and the effect in the water <u>as well as other effects on contaminants reaching water such as attenuation</u>. For nitrogen in the Upper Waikato River particularly, this is because of the time taken for nitrogen to travel through the soil profile into groundwater and then eventually into the rivers <u>and uncertainty around how much is attenuated before it reaches the rivers</u>. This means that there is some nitrogen leached from land use change that occurred decades ago that has entered groundwater, but has not yet entered the Waikato River <u>and for which the quantity and impact on water quality is very uncertain</u>. In some places, water quality (in terms of nitrogen) will <u>may</u> deteriorate before it gets better....'</p>	
		V1PC1-798	Glossary of Terms Support	WPL supports and opposes the

			<p>ADD a NEW definition of 'farm enterprise' to the Glossary of Terms to read: '<u>Definition – Farm enterprise</u> <u>Farm enterprise: For the purposes of Chapter 3.11, means the property upon which or enterprise within which farming activities are undertaken.</u>'</p>	<p>submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-802	<p>Glossary of Terms Support</p> <p>ADD to the Glossary of Terms a NEW definition of Most Practicable Action to read: '<u>Definition - Most Practicable Action Most Practicable Action ("MPA")</u>: For the purposes of a Farm Environment Plan and/or for the consideration of appropriate actions on farm to control diffuse contaminants associated with the farm enterprise, Most Practicable Action means the combination, priority and timing of actions to manage the discharge of contaminants from the farm enterprise that:</p> <p>a. recognises and provides for the characteristics of the sub-catchment within which the subject farm enterprise is located as set out in the relevant sub-catchment Management Plan and Catchment Profile produced by Waikato Regional Council; and</p> <p>b. corresponds to the scale and significance of the risk from the discharge of each contaminant from the farm enterprise to the likely</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>achievement of the short term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision & Strategy and values^ referred to in Objective 1; and</u> <u>c. takes account of the relative contribution of the industry sector within which the farm enterprise belongs to the likely achievement of the short term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision & Strategy and values^ referred to in Objective 1; and</u> <u>d. takes account of the resources reasonably available to the farm enterprise.'</u></p>	
		V1PC1-790	<p>75th percentile nitrogen leaching value definition Support with amendments</p> <p>AMEND the definition of 75th percentile leaching value to ensure properties are not penalised because they are on leaky soil or have high rainfall. AND AMEND the definition to read: 'The 75th percentile value... and enterprises within each <u>River</u> Freshwater Management Unit...'</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-793	<p>Cultivation definition Oppose with amendments</p> <p>AMEND paragraph b of the Definition of Cultivation to read: 'no tillage practices <u>farming practices that do not require tillage or disturbance of the ground including but not</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and</p>

			<p><u>limited to haymaking and topping of pasture.</u>' OR REPLACE with a new definition that appropriately captures and describes cultivation activities.</p>	<p>seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-794	<p>Drystock Farming definition DELETE the definition of drystock farming.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		V1PC1-795	<p>Enterprise definition Support with amendments AMEND the Definition of Enterprise/s to read: '... An enterprise is considered to be within a sub-catchment of more than 50% of that enterprise is within the sub-catchment <u>for the purposes of assessing the priority of sub-catchments in Table 3.11-2.</u>'</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-797	<p>Farming activities definition Oppose with amendments</p>	<p>WPL supports and opposes the submission because it</p>

			AMEND the Definition of Farming activities to read: 'For the purposes of Chapter 3.11, the grazing of animals or the growing of produce, including crops, commercial vegetable production and orchard produce but does not include planted production forest or the growing of crops on land irrigated by consented municipal wastewater discharges. '	is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-804	Nitrogen Reference Point definition Support with amendments AMEND the definition of Nitrogen Reference Point to read: 'The nitrogen loss number (units of kg N/ha/year) that is derived from an OVERSEER use protocol compliant OVERSEER file that describes the property or farm enterprise <u>(or parts of the property or farm enterprise, where it is more appropriate to calculate several Nitrogen Reference Points for the property or enterprise)</u> and farm practices ... (or another model or version of approved by the Council)...'	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
Fertilizer Association of New Zealand	73305	PC1-9699	Objective 1 Support the provision with amendments AMEND Objective 1 to read: "Long term <u>maintenance</u> , restoration and/or protection of water quality as relevant for each sub-catchment and Fresh Water Management Unit. By 2096, discharges of nitrogen, phosphorus,	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the

			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."	submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-9702	Objective 3 Support the provision with amendments AMEND Objective 3 to read: "Actions put in place to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>to water</u> , are sufficient to achieve <u>at least</u> ten percent of the required change between current water quality and the 80-year water quality attribute targets in Table 3.11-1..."	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-9703	Objective 4 Support the provision with amendments AMEND Objective 4(b) to read: "recognising that further contaminant reductions to water will may be required by subsequent regional plans and signalling anticipated future management approaches that will be needed to meet Objective 1."	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by

				WPL in its own submissions.
		PC1-9707	<p>Policy 1 Support the provision with amendments</p> <p>AMEND Policy 1 to read: "Manage and require reductions in sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to water and where the sub-catchment is over allocated <u>require reductions in these losses</u>, by:</p> <p>a. Enabling activities with a low level of contaminant discharge to water bodies provided those discharges losses do not increase <u>reduce water quality or compromise achievement of the water quality attribute targets in Table 3.11-1</u>; and</p> <p>b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges losses where <u>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>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-9784	<p>Policy 4 Support the provision with amendments</p> <p>AMEND Policy 4 to read: "Enabling activities with lower discharges of contaminant to water 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</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be

			<p>pathogens, and enable existing and new activities with low discharge ing activities to <u>water</u> to continue provided that cumulatively the achievement of Objective 3 is not compromised. Activities and uses currently defined as low discharges <u>to water</u> may in the future need to take mitigation actions that will reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>to water</u> in order for Objective 1 to be met."</p>	<p>allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-9788	<p>Policy 6 Oppose the provision with amendments</p> <p>AMEND Policy 6 to read: "Except as provided for in Policy 16...sediment or microbial pathogens <u>to water</u> which will potentially result in deterioration of <u>water quality</u> 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 <u>to water</u> will generally be granted."</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-9789	<p>Policy 7 Oppose the provision with amendments</p> <p>AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions <u>in diffuse contaminant loss</u> and any future property or enterprise-level allocation of diffuse losses discharges of nitrogen, phosphorus, sediment and microbial pathogens that will <u>may</u> be required by subsequent regional plans, by</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this</p>

			<p>implementing the policies and methods in this chapter... and researching the spatial variability of land use and contaminant losses the effect of contaminant discharges in different parts of the catchment that will assist in <u>understanding land and land use characteristic affecting contaminant loss defining 'land suitability'</u>. Any future allocation, taking effect from July 2026, should consider the following principles:</p> <ul style="list-style-type: none"> a. Land and land use characteristics <u>suitability</u> (5) which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes of allocation); and ... d. Future allocation decisions should take advantage of new data and knowledge, <u>including mitigation potential</u>" <p>AND AMEND Footnote 5 to read: "5. Future mechanisms for allocation ..."</p> <p>The future weightings are to be determined. For the avoidance of doubt, land suitability criteria exclude <u>include</u> current land use and current water quality, the moderating effects of potential mitigations, and non-physical criteria (economic, social and cultural). Instead <u>These factors are</u> will be <u>will be</u> of importance in analysing the implications of a completed land suitability classification."</p>	<p>would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-9835	Method 3.11.4.7	WPL supports and

			<p>Support the provision with amendments</p> <p>AMEND Method 3.11.4.7 to read: "Gather information and commission appropriate scientific research to inform any future framework for the allocation of diffuse discharges including:</p> <p>a. Implementing processes that will support the setting of property or enterprise-level limits in the future for diffuse discharge <u>to water limits in the future.</u></p> <p>b. Researching:</p> <p>i. The quantum of contaminants that can be <u>lost to water discharged</u> at a sub-catchment and Freshwater Management Unit scale while meeting the Table 3.11-1 water quality attribute targets.</p> <p>...</p> <p>iii. Tools for measuring or modelling discharges <u>to water</u> from individual properties, enterprises and sub-catchments and how this can be related to Table 3.11-1 water quality attribute targets."</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-9839	<p>Method 3.11.4.8</p> <p>Support the provision with amendments</p> <p>AMEND Method 3.11.4.8 to read: "Waikato Regional Council will:</p> <p>a. <u>Review information gathered under Method 3.11.4.7 and factors arising during implementation of Chapter 3.11</u></p> <p>a-b. Develop discharge allocation frameworks for <u>discharge to water</u> for individual properties and enterprises based on information collected under Method 3.11.4.7, taking into account the best available data, knowledge and technology at the time; and</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own</p>

			b.c. Use this to inform future changes to the Waikato Regional Plan to manage discharges <u>to water</u> of nitrogen, phosphorus, sediment and microbial pathogens at a property or enterprise-level to meet the targets in the objectives."	submissions.
		PC1-10613	Method 3.11.4.11 Support the provision RETAIN Method 3.11.4.11.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10621	Rule 3.11.5.2 Support the provision with amendments 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 the greater of either: 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</u>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<u>management practices; and...</u> "	
		PC1-10624	Rule 3.11.5.3 Support the provision RETAIN Rule 3.11.5.3.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10626	Rule 3.11.5.4 Support the provision with amendments AMEND Matter of Control (iv) to read: "Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure <u>reduce</u> the diffuse losses discharge of nitrogen <u>to water using best practicable options in keeping with industry agreed good management practice, prior to a nitrogen loss allocation system being decided and introduced</u> is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026. "	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10628	Rule 3.11.5.5 Oppose the provision with amendments DELETE Rule 3.11.5.5(f) and (g) AND DELETE Matter of Control (ii).	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this

				would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10631	Rule 3.11.5.6 Support the provision RETAIN Rule 3.11.5.6.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10632	Rule 3.11.5.7 Oppose the provision with amendments AMEND Rule 3.11.5.7 to be a discretionary activity.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10642	Schedule B Support the provision with amendments AMEND Schedule B(a) to read: "a. The Nitrogen Reference Point must be calculated by a Certified Farm Nutrient Management Adviser to determine	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its

			<p>the amount of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point shall be determined through the Rule 3.11.5.7 consent process"</p> <p>AND AMEND Clause (f) to read: "The reference period is the two <u>four</u> financial years covering 2014/2015 2012/2013 and to 2015/2016, except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016."</p> <p>AND AMEND Clause (g)(i) to read: "Stock numbers are recorded in annual accounts together with stock sale and purchase invoices, <u>or for monthly stock records, farm diary or similar:</u>"</p> <p>AND DELETE the entire second row (beginning 'Location; Pastoral and Horticulture') from Table 1.</p>	<p>own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-12401	<p>Schedule 1 Oppose the provision with amendments</p> <p>Schedule 1 - DELETE Row number 7 from the table under Vegetable Growing Minimum Standards. AND AMEND Row 8 from the table under Vegetable Growing Minimum Standards to read: "8 7 - Nitrogen Phosphorous - Evidence available to demonstrate split applications by block/crop <u>in accordance with the Code of Practice for Nutrient Management (with emphasis on fertiliser use), which includes calibration of application equipment, following expert approved practice</u> relating to:..."</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

		PC1-10650	<p>Schedule 1 Support the provision with amendments</p> <p>AMEND Schedule 1(2) to read: "(d) An assessment of appropriate land use and grazing management for specific areas on the farm in order to maintain and improve the physical and biological condition of soils and minimise the diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens to water bodies, including:</p> <p>(i) matching land use to land capability; and (ii)(i) identifying areas not suitable for grazing; and (iii)(ii) stocking policy to maintain soil condition and pasture cover; and (iv)(iii) to appropriate location and management of winter forage crops; and (v)(iv) suitable management practices for strip grazing.</p> <p>(e) A description of nutrient management practices including a nutrient budget <u>prepared by a Certified Nutrient Management Advisor</u> for the farm enterprise calculated using OVERSEER in accordance with the OVERSEER use protocols <u>Data Input Standards 2016, with the exceptions and inclusions set out in Schedule B, Table 1</u>, or using any other model or method approved by the Chief Executive Officer of Waikato Regional Council.</p> <p>...</p> <p>5(a) Actions, timeframes and other measures to ensure that the diffuse loss <u>discharge</u> of nitrogen from the property or enterprise...</p> <p>(b) Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value,</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			actions, timeframes and other measures to ensure the diffuse discharge of nitrogen <u>to water</u> is reduced <u>using best practicable options in keeping with industry agreed good management practice, prior to nitrogen loss allocation systems being decided and introduced. so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026, except in the case of Rule 3.11.5.5."</u>	
		PC1-10663	<p>Certified Farm Nutrient Advisor definition Oppose the provision</p> <p>Undertake further consultation between the submitter and Waikato Regional Council to ensure a nationally consistent certification programme which meets Regional Council requirements is adopted for nutrient management advisors. AND AMEND the definition to read: "Certified Farm Nutrient Advisor is a person certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a certified farm nutrient advisor and has the following qualifications and experience: a. Has completed nutrient management training to at least intermediate level, and b. Has experience in nutrient management planning." <u>"Certified Nutrient Management Advisor: is a nutrient management advisor certified under the Nutrient Management Advisor Certification Programme Ltd, or approved by the Chief Executive Officer of Waikato Regional Council as equivalent."</u> OR AMEND to read: "<u>Approved Nutrient Advisors: means Waikato Regional Council approved</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<u>nutrient advisors listed on a register of approved providers on the Waikato Regional Council website."</u>	
		PC1-10666	<p>Diffuse discharge definition Oppose the provision with amendments</p> <p>AMEND the definition of Diffuse Discharge/s to read: "For the purposes of Chapter 3.11, means the discharge of contaminants that results from land use activities including cropping and the grazing of livestock and includes non point source discharges Means losses to the <u>environment which are not from a point source, and have potential to contribute to a cumulative impact on the receiving environment.</u>"</p> <p>If deemed necessary to have a unique definition for Chapter 3.11, then AMEND the Definition to read: "For the purposes of Chapter 3.11, means the discharge of contaminants losses that results from land use activities, including cropping, forestry and the grazing of livestock, and includes which are not from non point source discharges <u>and have potential to contribute to a cumulative impact on the receiving environment.</u>"</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10669	<p>Nitrogen Reference Point definition Support the provision with amendments</p> <p>AMEND the Definition of Nitrogen Reference Point to reference the OVERSEER Data Input Standards and to Certified Nutrient Management Advisor, if the submission point on the certification scheme are accepted.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this

				would be consistent with the specific decisions sought by WPL in its own submissions.
Fonterra Co-operative Group Ltd	74057	PC1-10451	<p>General Support the provision with amendments</p> <p>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:</p> <ol style="list-style-type: none"> 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. <p>AND AMEND all references to 'short term objectives' to read: "short term <u>freshwater</u> objectives"</p> <p>AND AMEND all references to 'long term freshwater objectives' to read: "long term freshwater objectives"</p> <p>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 <u>states</u>" or, where the context requires, to Objective 1 and/or Objective 3.</p> <p>AND AMEND to ensure all amendments to both the English text and Māori translation.</p> <p>AND AMEND to provide for any consequential or</p>	WPL supports the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			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.	
		PC1-10455	Objective 1 Support the provision with amendments AMEND Objective 1 to read: "...By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in the achievement of the restoration and protection, <u>and where necessary restoration, of the 80 year water quality to achieve the 80 year attribute targets states</u> in Table 3.11-1."	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1360	Objective 1 Support with amendments APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10455, to the extent it is not modified by their V1 submission: [AMEND Objective 1 to read: "...By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in the achievement of the restoration and protection, <u>and where necessary restoration, of the 80 year water quality to achieve the 80 year attribute targets states</u> in Table 3.11-1."]	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

		PC1-10459	<p>Objective 3 Support the provision with amendments</p> <p>AMEND Objective 3 to read: "...Actions put in place and implemented by 2026 to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, are sufficient to achieve ten percent of the required change between current water quality and the desired 80-year water quality attribute ^{^ targets ^} states in Table 3.11-1. A ten percent change towards the long term desired water quality improvements states is indicated by the short term water quality attribute ^{^ targets ^} <u>states</u> in Table 3.11-1."</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1362	<p>Objective 3 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10459, to the extent it is not modified by their V1 submission: [AMEND Objective 3 to read: "...Actions put in place and implemented by 2026 to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, are sufficient to achieve ten percent of the required change between current water quality and the desired 80-year water quality attribute ^{^ targets ^} states in Table 3.11-1. A ten percent change towards the long term desired water quality improvements states is indicated by the short term water quality attribute ^{^ targets ^} <u>states</u> in Table 3.11-1."]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10468	Objective 4	WPL supports and

			<p>Support the provision with amendments</p> <p>AMEND Objective 4 to read: "...a) considering the values and uses <u>identified in Section 3.11.1</u> when taking action to achieve <u>Objectives 1 and 3</u> the attribute targets for the Waikato and Waipā Rivers in Table 11-1; and..."</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1363	<p>Objective 4 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10468, to the extent it is not modified by their V1 submission: [AMEND Objective 4 to read: "...a) considering the values and uses <u>identified in Section 3.11.1</u> when taking action to achieve <u>Objectives 1 and 3</u> the attribute targets for the Waikato and Waipā Rivers in Table 11-1; and..."]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10469	<p>Policy 1 Support the provision with amendments</p> <p>AMEND Policy 1 so the policy test that applies to the enablement of low discharging activities is consistent with Policy 4, amend to read:</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its</p>

			"...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... "	own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1364	<p>Policy 1 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10469, to the extent it is not modified by their V1 submission: [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..."]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10471	<p>Policy 4 Oppose the provision</p> <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</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent

			<p>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.</p> <p><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> <ul style="list-style-type: none"> <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);</u> <p><u>Provided that high risk diffuse discharge practices are avoided."</u></p> <p><u>AND ADD a NEW Policy 4A to read: "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><u>AND ADD a NEW Policy 4AB to read: "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:</u></p> <ul style="list-style-type: none"> <u>a. They are part of an industry scheme designed to manage diffuse discharge risk; and</u> <u>b. In accordance with that industry scheme the</u> 	<p>with the specific decisions sought by WPL in its own submissions.</p>
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			<u>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> "	
		V1PC1-	<p>Policy 4 Oppose</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10471, to the extent it is not modified by their V1 submission:</p> <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.</p> <p><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);</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p><u>Provided that 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 or 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:</u></p> <p><u>a. They are part of an industry scheme designed to manage diffuse discharge risk; and</u></p> <p><u>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>	
		PC1-10473	<p>Policy 6 Oppose the provision</p> <p>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:</u></p> <p><u>a. Not result in increased diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens; and/or</u></p> <p><u>b. Promote the implementation of Policy 16."</u></p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

		V1PC1-1349	<p>Policy 6 Oppose</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10473, to the extent it is not modified by their V1 submission: [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:</u> <u>a. Not result in increased diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens; and/or</u> <u>b. Promote the implementation of Policy 16.</u>"]</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-10474	<p>Policy 7 Oppose the provision with amendments</p> <p>REPLACE Policy 7 to read: <u>"Policy 7: Preparing for enhanced future water quality management</u> <u>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 E.coli beyond those identified in Objective 3."</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1353	<p>Policy 7 Oppose with amendments</p>	<p>WPL supports and opposes the submission because it</p>

			<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10474, to the extent it is not modified by their V1 submission: [REPLACE Policy 7 to read: "Policy 7: Preparing for enhanced future water <u>quality management</u> <u>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 E.coli beyond those identified in Objective 3.</u>"]</p>	<p>is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10492	<p>Rule 3.11.5.2 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.2 (4) b ii to read: "...b. The diffuse discharge of nitrogen from the property or enterprise does not exceed either:...whichever is the lesser, over the <u>effective hectares of the whole</u> property or enterprise assessed in accordance with Schedule B." AND ADD a NEW definition of 'effective hectares' to read: "<u>Effective hectares: means the area of a property or enterprise as measured in hectares which is used for the regular grazing of animals or growing of crops or activities ancillary to those uses and which specifically excludes indigenous forest, plantation forest, closed canopy scrubland and protected wetlands.</u>" AND ADD a NEW definition of 'protected wetland' to read: "<u>Protected wetland: for the purpose of the</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>definition of 'effective hectares' means a wetland that is fenced to exclude stock or which is legally protected by a rule in a district or regional plan, condition of resource consent or other legally binding instrument such that it cannot be lawfully grazed, drained, cleared or otherwise modified without the consent of a local authority or third party and for which no such consent has been issued. This definition excludes any wetland constructed for the purpose of mitigating the effects of agricultural discharges on water quality."</u></p>	
		V1PC1-765	<p>Rule 3.11.5.2 Support with amendments</p> <p>AMEND Rule 3.11.5.2 as follows: Rule 3.11.5.2 - Permitted Activity Rule - Other Farming Activities Small and/or low to medium nitrogen leaching risk farming activities The use of land for farming activities (excluding commercial vegetable production) 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 <u>that is not permitted under Rule 3.11.5.1 where the property area is greater than 4.1 hectares, and has more than 6 stock units per hectare or is used for arable cropping</u>, is a permitted activity subject to the following conditions: 1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and 2. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C and Conditions 3(e)(c) and 4(e)(f) of this Rule;</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>and</p> <p>3. Where The property area is less than or equal to 20 hectares; and</p> <p>a. The farming activities do not form part of an enterprise being undertaken on more than one property; and</p> <p><u>b. Less than 25% of the feed consumed by any livestock on the property is imported onto the property;</u></p> <p>b-c. Where the land is:</p> <p>i. used for grazing livestock, the stocking rate of the land is no greater than the stocking rate of the land at 22 October 2016; or</p> <p>ii. not used for grazing livestock, the land use has the same or lower diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens as the land use at 22 October 2016; and</p> <p>c-d. Upon request, the landowner shall obtain and provide to the <u>Waikato Regional Council</u> independent verification from a Certified Farm Environment Planner that the use of land is compliant with either b-c(i) or b-c(ii); above</p> <p>d-e. Upon request from the <u>Waikato Regional Council</u>, a description of the current land use activities shall be provided to the Council; and</p> <p>e-f. Where the property or enterprise contains any of the water bodies listed in Schedule C, new fences installed after 22 October 2016 must be located to ensure cattle, horses, deer and pigs cannot be within three metres of the bed of the water body (excluding constructed wetlands and drains); or</p> <p>4. Where The property or enterprise has an area is greater than 20 hectares and:</p> <p>a. A Nitrogen Reference Point is produced for the</p>	
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			<p>property or enterprise in conformance with Schedule B; and The peak stocking rate is less than 10 stock units per hectare;</p> <p>b. The diffuse discharge of nitrogen from the property or enterprise does not exceed either:</p> <p>i. The Nitrogen Reference Point; or</p> <p>ii. 15kg nitrogen/hectare/year; whichever is the lesser, over the whole property or enterprise when assessed in accordance with Schedule B; and</p> <p>Less than 5% of the property is cultivated in any one year;</p> <p>d-c. No winter forage crops are grazed in situ.</p> <p>d. No winter forage crops are grazed in situ; and</p> <p><u>A reference level of nitrogen leaching, is provided to the Waikato Regional Council in the form of either:</u></p> <p><u>(i) An Nitrogen Reference Point calculated in accordance with Schedule B; or</u></p> <p><u>(ii) A Nitrogen Risk Scorecard Reference Grade determined in accordance with Schedule BA.</u></p> <p>e. Where the property or enterprise contains any of the water bodies listed in Schedule C:</p> <p>i. There shall be no cultivation within 5 metres of the bed of the water body; and</p> <p>ii. New fences installed after 22 October 2016 must be located to ensure cattle, horses, deer and pigs cannot be within three metres of the bed of the water body (excluding constructed wetlands and drains) and</p> <p><u>Nitrogen leaching from the property or enterprise does not exceed the reference level of nitrogen leaching for the property or enterprise submitted to the Waikato Regional Council in accordance with condition 4 d, as demonstrated by either:</u></p> <p><u>(i) the three-year rolling average as submitted to the Waikato Regional Council by 1 July each</u></p>	
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			<p><u>year; or</u> <u>(ii) an annual Nitrogen Risk Scorecard Assessment undertaken in accordance with Schedule BA and submitted to the Waikato Regional Council by 1 July each year.</u> <u>f. A Farm Environment Plan is prepared in accordance with Schedule 1, is approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council by 1 July 2023;</u> <u>g. The use of land is undertaken in accordance with the actions and timeframes specified in the Farm Environment Plan;</u> <u>h. The Farm Environment Plan provided under Condition 4f may be amended in accordance with the procedure set out in Schedule 1 and the use of land shall thereafter be undertaken in accordance with the amended plan;</u> <u>i. A copy of the Farm Environment Plan amended in accordance with condition 4h shall be provided to the Waikato Regional Council within 30 working days of the date of its amendment;</u> <u>j. Where the property or enterprise contains any of the water bodies listed in Schedule C:</u> <u>i. There shall be no cultivation within 5 metres of the bed of the water body; and</u> <u>ii. New fences installed after 22 October 2016 must be located to ensure cattle, horses, deer and pigs cannot be within three metres of the bed of the water body (excluding constructed wetlands and drains); and</u> 5. For all properties greater than 4.1 hectares, from 31 March 2019 to 30 November 2020, in addition to the requirements of Schedule A, the following information must be provided to the Waikato Regional Council by 1 September each year: <u>a. annual stock numbers; and</u></p>	
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			<p><u>b. Annual fertiliser use; and</u> <u>c. Annual brought in animal feed.</u> <u>The property or enterprise is used for arable cropping; and</u> <u>a. No part of the property is used for grazing livestock</u> <u>b. Arable cropping does not occur within 3 meters of any waterbody</u> <u>c. No part of the property or enterprise over 15 degrees slope is cultivated</u> <u>d. Upon request, the landowner shall obtain and provide to the Council independent verification from a Certified Farm Environment Planner that the use of land is compliant with 5 a to d above.</u> <u>e. A reference level of nitrogen leaching and associated data, is provided to the Waikato Regional Council at the date of registration in the form of either:</u> <u>(i) A Nitrogen Reference Point calculated in accordance with Schedule B; or</u> <u>(ii) A Nitrogen Risk Scorecard Grade determined in accordance with Schedule BA.</u> <u>f. Nitrogen leaching from the property or enterprise does not exceed the reference level of nitrogen leaching for the property or enterprise submitted to the Waikato Regional Council in accordance with condition 4 d, as demonstrated by either:</u> <u>(i) the three-year rolling average as calculated each year and submitted to the Waikato Regional Council; or</u> <u>(ii) an annual Nitrogen Risk Scorecard Assessment undertaken in accordance with Schedule BA and submitted to the Waikato Regional Council by 1 July each year.</u> <u>g. A Farm Environment Plan is prepared in accordance with Schedule 1, is approved by a</u></p>	
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			<p><u>Certified Farm Environment Planner, and is provided to the Waikato Regional Council by 1 July 2023;</u></p> <p><u>h. The use of land is undertaken in accordance with the actions and timeframes specified in the Farm Environment Plan;</u></p> <p><u>i. The Farm Environment Plan provided under Condition 4g may be amended in accordance with the procedure set out in Schedule 1 and the use of land shall thereafter be undertaken in accordance with the amended plan;</u></p> <p><u>j. A copy of the Farm Environment Plan amended in accordance with condition 4h shall be provided to the Waikato Regional Council within 30 working days of the date of its amendment;</u></p>	
		PC1-10496	<p>Rule 3.11.5.3 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.3 to read: "...2. A Nitrogen Reference Point is produced <u>calculated</u> for the property or enterprise in conformance with Schedule B <u>and provided to Waikato Regional Council within the period 1 September 2018 to 31 March 2019;</u> and 3. The three-year rolling average does not exceed the Nitrogen Reference Point calculated in accordance with condition 2 from the date on which the Nitrogen Reference Point is provided to the Waikato Regional Council; and" [Bullet point 3 becomes bullet 4.] "4.5. The Certified Industry Scheme meets the criteria standards set out in Schedule 2 and has been approved by the Chief Executive Officer of Waikato Regional Council; and 5.6. A Farm Environment Plan which has been prepared in accordance with Schedule 1 and has</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p>been approved by a Certified Farm Environment Planner, is provided to the Waikato Regional Council as follows: a. By by 1 July 2020.... for properties or enterprises within Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</p> <p>b. By 1 July 2023 for properties or enterprises within Priority 2 sub-catchments listed in Table 3.11-2;</p> <p>c. By 1 July 2026 for properties or enterprises within Priority 3 sub-catchments listed in Table 3.11-2; and"</p> <p>AND RETAIN Conditions 6, 7 and 8 as notified (but renumbered as appropriate).</p>	
		V1PC1-779	<p>Rule 3.11.5.3 Support with amendments</p> <p>AMEND sections of Rule 3.11.5.3 as follows:</p> <p>2. A Nitrogen Reference Point is produced <u>calculated</u> for the property or enterprise in conformance with Schedule B <u>within the period May 2020 to 30 November 2020</u>; and</p> <p>4. The Certified Industry Scheme meets the criteria <u>standards</u> set out in Schedule 2 and has been approved by the Chief Executive Officer of Waikato Regional Council; and</p> <p>5. A Farm Environment Plan which has been prepared in accordance with Schedule 1 and has been approved by a Certified Farm Environment Planner, is provided to the Waikato Regional Council as follows:</p> <p>a. B by 1 July 2021. for properties or enterprises within Priority 1 sub-catchments listed in Table 3.11-2 and properties or enterprises within a</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p>Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</p> <p>b. By 1 July 2023 for properties or enterprises within Priority 2 sub-catchments listed in Table 3.11-2</p> <p>c. By 1 July 2026 for properties or enterprises within Priority 3 sub-catchments listed in Table 3.11-2; and</p> <p>6. The use of land shall be undertaken in accordance with the actions and timeframes specified in the Farm Environment Plan; and <u>Where the property or farm enterprise has a Nitrogen Reference Point below the 50th percentile nitrogen leaching value, either:</u></p> <p>a. <u>The three-year rolling average for the property or enterprise does not exceed the Nitrogen Reference Point from the date on which the Nitrogen Reference Point is provided to the Waikato Regional Council; or</u></p> <p>b. <u>The property or enterprise has an annual Nitrogen Risk Scorecard Assessment Grade the same as the Nitrogen Risk Scorecard Assessment Grade as assessed in accordance with Schedule BA; and</u></p> <p>c. <u>The information required to undertake the Nitrogen Risk Scorecard Assessment as set out in Schedule BA shall be provided to the Waikato Regional Council by 1 July each year in the template prescribed in Schedule BA e; or</u></p> <p>7. The Farm Environment Plan provided under Condition 5 may be amended in accordance with the procedure set out in Schedule 1 and the use of land shall thereafter be undertaken in accordance with the amended plan; and <u>Where the property or farm enterprise has a Nitrogen Reference Point above the 50th percentile nitrogen leaching value but below the</u></p>	
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			<p><u>75th percentile nitrogen leaching value, the three-year rolling average does not exceed the Nitrogen Reference Point from the date on which the Nitrogen Reference Point is provided to the Waikato Regional Council; or</u></p> <p>8. A copy of the Farm Environment Plan amended in accordance with condition (7) shall be provided to the Waikato Regional Council within 30 working days of the date of its amendment.</p> <p><u>Where the property or farm enterprise has a Nitrogen Reference Point above the 75th percentile nitrogen leaching value, the Farm Environment Plan for the property or enterprise will set out actions, timeframes and other measures to ensure that diffuse discharge of nitrogen is progressively reduced so that it does not exceed that 75th percentile nitrogen leaching value by 2026.</u></p> <p>AND RETAIN conditions 1, 3, 6, 7 and 8 as notified (but renumbered as appropriate).</p>	
		PC1-10500	<p>Rule 3.11.5.4 Oppose the provision</p> <p>AMEND Rule 3.11.5.4 and reorder to read: "Rule 3.11.5.42A – Controlled Permitted Activity Rule – Pre-2020 Farming activities with a Farm Environment Plan not under a Certified Industry Scheme Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2, until January 2020, the use of land for farming activities... entering water is a permitted activity until:"</p> <p>AND DELETE Points Bullets 1,2 and 3. "Subject to the following conditions: 41. The property is registered with the Waikato</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>Regional Council in conformance with Schedule A; and</p> <p><u>52. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and provided to Waikato Regional Council within the period 1 September 2018 to 31 March 2019; and</u></p> <p>After the dates set out in 1), 2) and 3) above the use of land shall be a controlled activity (requiring resource consent), subject to the following standards and terms:</p> <p>a. A Farm Environment Plan has been prepared in conformance with Schedule 1 and has been approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council at the time the resource consent application is lodged by the dates specified in I-III below; and</p> <p>b. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</p> <p>c. A Nitrogen Reference point is produced for the property or enterprise in conformance with Schedule B and is provided to the Waikato Regional Council at the time the resource consent application is lodged; and</p> <p><u>3. The three year rolling average does not exceed the Nitrogen Reference Point calculated in accordance with condition 2 from the date on which the Nitrogen Reference Point is provided to the Waikato Regional Council; and</u></p> <p><u>d4. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C."</u></p> <p>AND ADD a replacement Rule 3.11.5.4 as follows:</p> <p>"Rule 3.11.5.4 – Controlled Activity Rule – From</p>	
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			<p><u>2020 farming activities with a Farm Environment Plan not under a Certified Industry Scheme Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2, from 1 January 2020, the use of land for farming activities (excluding commercial vegetable production) where that land use is not 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 controlled activity subject to the following standards and terms:</u></p> <ol style="list-style-type: none"> <u>1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</u> <u>2. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and is provided to the Waikato Regional Council at the time the resource consent is lodged; and</u> <u>3. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and</u> <u>4. Farm Environment Plan has been prepared in conformance with Schedule 1 and has been approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council at the time the resource consent application is lodged; and</u> <u>5. Annual records of the nitrogen leaching value are kept and submitted to the Waikato Regional Council by 1 July each year demonstrating that the three-year rolling average nitrogen leaching value as determined using the most recent version of OVERSEER is not, over the duration of the consent, increased beyond the property or</u> 	
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			<p><u>enterprise's Nitrogen Reference Point. Matters of Control</u> <u>Waikato Regional Council reserves control over the following matters:</u></p> <p><u>i. The content of the Farm Environment Plan, provided that the Farm Environment Plan is no less stringent than specified in Schedule 1.</u></p> <p><u>ii. The actions and timeframes for undertaking mitigation actions that maintain or reduce the diffuse discharges of phosphorus, sediment or microbial pathogens to water or to land where they may enter water.</u></p> <p><u>iii. The three-year rolling average annual nitrogen loss rate (except that, in accordance with standard 5 no such nitrogen loss shall exceed the Nitrogen Reference Point).</u></p> <p><u>iv. Compliance with Policy 2.</u></p> <p><u>v. The duration of the consent.</u></p> <p><u>vi. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent to demonstrate and/or monitor compliance with the Farm Environment Plan.</u></p> <p><u>vii. The timeframe and circumstances under which the consent conditions may be reviewed of the Farm Environment Plan shall be amended.</u></p> <p><u>viii. Procedures for reviewing, amending and re-approving the Farm Environment Plan."</u></p>	
		V1PC1-788	<p>Rule 3.11.5.4 Oppose with amendments</p> <p>AMEND Rule 3.11.5.4 as necessary, to provide for the Nitrogen Risk Scorecard approach [see submission points V1PC1- 801, 814 and 815 as reference to this approach].</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the</p>

				submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1725	<p>Rule 3.11.5.4 Oppose with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10500: [AMEND Rule 3.11.5.4 and reorder to read: "Rule 3.11.5.42A - Controlled Permitted Activity Rule - <u>Pre-2020</u> Farming activities with a Farm Environment Plan not under a Certified Industry Scheme</p> <p>Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2, <u>until January 2020</u>, the use of land for farming activities... entering water is a permitted activity until:"</p> <p>AND DELETE Points Bullets 1,2 and 3.</p> <p>"Subject to the following conditions:</p> <p><u>4</u>1. The property is registered with the Waikato Regional Council in conformation with Schedule A; and</p> <p><u>5</u>2. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B <u>and provided to Waikato Regional Council within the period 1 September 2018 to 31 March 2019</u>; and</p> <p>After the dates set out in 1), 2) and 3) above the use of land shall be a controlled activity (requiring resource consent), subject to the following standards and terms:</p> <p>a. A Farm Environment Plan has been prepared</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>in conformance with Schedule 1 and has been approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council at the time the resource consent application is lodged by the dates specified in I-III below; and</p> <p>b. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</p> <p>c. A Nitrogen Reference point is produced for the property or enterprise in conformance with Schedule B and is provided to the Waikato Regional Council at the time the resource consent application is lodged; and</p> <p><u>3. The three year rolling average does not exceed the Nitrogen Reference Point calculated in accordance with condition 2 from the date on which the Nitrogen Reference Point is provided to the Waikato Regional Council; and</u></p> <p><u>d4. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C."</u></p> <p>AND ADD a replacement Rule 3.11.5.4 as follows:</p> <p><u>"Rule 3.11.5.4 – Controlled Activity Rule – From 2020 farming activities with a Farm Environment Plan not under a Certified Industry Scheme Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2, from 1 January 2020, the use of land for farming activities (excluding commercial vegetable production) where that land use is not 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 controlled activity subject to the following</u></p>	
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			<p><u>standards and terms:</u></p> <p><u>1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</u></p> <p><u>2. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and is provided to the Waikato Regional Council at the time the resource consent is lodged; and</u></p> <p><u>3. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and</u></p> <p><u>4. Farm Environment Plan has been prepared in conformance with Schedule 1 and has been approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council at the time the resource consent application is lodged; and</u></p> <p><u>5. Annual records of the nitrogen leaching value are kept and submitted to the Waikato Regional Council by 1 July each year demonstrating that the three-year rolling average nitrogen leaching value as determined using the most recent version of OVERSEER is not, over the duration of the consent, increased beyond the property or enterprise's Nitrogen Reference Point.</u></p> <p><u>Matters of Control</u></p> <p><u>Waikato Regional Council reserves control over the following matters:</u></p> <p><u>i. The content of the Farm Environment Plan, provided that the Farm Environment Plan is no less stringent than specified in Schedule 1.</u></p> <p><u>ii. The actions and timeframes for undertaking mitigation actions that maintain or reduce the diffuse discharges of phosphorus, sediment or microbial pathogens to water or to land where they may enter water.</u></p>	
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			<p><u>iii. The three-year rolling average annual nitrogen loss rate (except that, in accordance with standard 5 no such nitrogen loss shall exceed the Nitrogen Reference Point).</u></p> <p><u>iv. Compliance with Policy 2.</u></p> <p><u>v. The duration of the consent.</u></p> <p><u>vi. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent to demonstrate and/or monitor compliance with the Farm Environment Plan.</u></p> <p><u>vii. The timeframe and circumstances under which the consent conditions may be reviewed of the Farm Environment Plan shall be amended.</u></p> <p><u>viii. Procedures for reviewing, amending and re-approving the Farm Environment Plan."]</u></p>	
		PC1-10505	<p>Rule 3.11.5.5 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.5 by separating the permitted and controlled parts of Rule 3.11.5.5 into two rules with the permitted activity rule making commercial vegetable production prior to 1 January 2020 a permitted activity subject to conditions that ensure that there is no expansion of the aggregate land area devoted to that use prior to that date. AND within the controlled activity rule, AMEND conditions f. and g. to read: "...f. the total area of land for which consent is sought for commercial vegetable production must not exceed the maximum land area of the property or enterprise that was used for commercial vegetable production <u>in any single year</u> during the period 1 July 2006 to 20 June 2016; and g. where any new land is proposed to be used for</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			commercial vegetable production <u>that has not been previously used for commercial vegetable production during the 1 July 2006 to 30 June 2026 period</u> , an equivalent area of land must be removed from commercial vegetable production in order to comply with standard and term f; and..."	
		V1PC1-1354	<p>Rule 3.11.5.5 Oppose with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10505, to the extent it is not modified by their V1 submission:</p> <p>[AMEND Rule 3.11.5.5 by separating the permitted and controlled parts of Rule 3.11.5.5 into two rules with the permitted activity rule making commercial vegetable production prior to 1 January 2020 a permitted activity subject to conditions that ensure that there is no expansion of the aggregate land area devoted to that use prior to that date. AND within the controlled activity rule, AMEND conditions f. and g. to read:</p> <p>"...f. the total area of land for which consent is sought for commercial vegetable production must not exceed the maximum land area of the property or enterprise that was used for commercial vegetable production <u>in any single year</u> during the period 1 July 2006 to 20 June 2016; and</p> <p>g. where any new land is proposed to be used for commercial vegetable production <u>that has not been previously used for commercial vegetable production during the 1 July 2006 to 30 June 2026 period</u>, an equivalent area of land must be removed from commercial vegetable production</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			in order to comply with standard and term f; and..."]	
		PC1-10506	<p>Rule 3.11.5.6 Oppose the provision</p> <p>DELETE Rule 3.11.5.6 and REPLACE with a Rule that reads: <u>"3.11.5.6 Discretionary Activity Rule – The use of land for farming activities</u> <u>The following activities are discretionary activities (requiring resource consent):</u> <u>1. The use of land for farming activities 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 that does not comply with the conditions, standards or terms of Rules 3.11.5.1 to 3.11.5.5 subject to the following standards and terms:</u> <u>a. The three-year rolling average does not exceed the Nitrogen Reference Point, or where no Nitrogen Reference Point has been calculated the average nitrogen loss for the property or enterprise over the three-year period ending 30 June of the year preceding the year the application is made.</u> <u>2. Any of the following 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 River catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares:</u> <u>i. Woody vegetation to farming activities; or</u> <u>ii. Any livestock grazing other than dairy farming to dairy farming; or</u> <u>iii. Arable cropping to dairy farming; or</u></p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.

			<p><u>iv. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5. Subject to the following standards and terms:</u></p> <p><u>a. The three-year rolling average does not exceed the Nitrogen Reference Point, or where no Nitrogen Reference Point has been calculated the average nitrogen loss for the property or enterprise over:</u></p> <p><u>b. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C.</u></p> <p><u>NOTE: for the purposes of this rule, 'occurring' means a land use being undertaken and this phrase does not include changes in land use for which resource consent or certificates of compliance might have been held but no increased discharges of contaminants had commenced as at 22 October 2016."</u></p> <p>AND AMEND other parts of PPC1 as necessary to clarify that land use change within a property or enterprise (>4.1 ha) that does not increase the total area within that property devoted to that land use beyond 4.1 hectares is not caught by this rule.</p>	
		V1PC1-1351	<p>Rule 3.11.5.6 Oppose</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10506, to the extent it is not modified by their V1 submission: [DELETE Rule 3.11.5.6 and REPLACE with a Rule that reads: <u>"3.11.5.6 Discretionary Activity Rule – The use of land for farming activities</u></p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p><u>The following activities are discretionary activities (requiring resource consent):</u></p> <p><u>1. The use of land for farming activities 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 that does not comply with the conditions, standards or terms of Rules 3.11.5.1 to 3.11.5.5 subject to the following standards and terms:</u></p> <p><u>a. The three-year rolling average does not exceed the Nitrogen Reference Point, or where no Nitrogen Reference Point has been calculated the average nitrogen loss for the property or enterprise over the three-year period ending 30 June of the year preceding the year the application is made.</u></p> <p><u>2. Any of the following 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 River catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares:</u></p> <p><u>i. Woody vegetation to farming activities; or</u></p> <p><u>ii. Any livestock grazing other than dairy farming to dairy farming; or</u></p> <p><u>iii. Arable cropping to dairy farming; or</u></p> <p><u>iv. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5. Subject to the following standards and terms:</u></p> <p><u>a. The three-year rolling average does not exceed the Nitrogen Reference Point, or where no Nitrogen Reference Point has been calculated the average nitrogen loss for the property or enterprise over:</u></p> <p><u>b. Cattle, horses, deer and pigs are excluded</u></p>	
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			<p><u>from water bodies in conformance with Schedule C.</u></p> <p><u>NOTE: for the purposes of this rule, 'occurring' means a land use being undertaken and this phrase does not include changes in land use for which resource consent or certificates of compliance might have been held but no increased discharges of contaminants had commenced as at 22 October 2016."</u></p> <p>AND AMEND other parts of PPC1 as necessary to clarify that land use change within a property or enterprise (>4.1 ha) that does not increase the total area within that property devoted to that land use beyond 4.1 hectares is not caught by this rule.]</p>	
		PC1-10513	<p>Rule 3.11.5.7 Support the provision with amendments</p> <p>DELETE Rule 3.11.5.7 and REPLACE with a Rule that reads: <u>"Rule 3.11.5.7 – Non-complying Activity Rule – The use of land for farming activities and land use change</u> <u>The following activities are non-complying activities (requiring resource consent):</u> <u>1. The use of land for farming activities 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; and</u> <u>2. Any of the following changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise location in the Waikato and Waipā catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares;</u></p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p><u>i. Woody vegetation to farming activities; or</u> <u>ii. Any livestock grazing other than dairy farming to dairy farming; or</u> <u>iii. Arable cropping to dairy farming; or</u> <u>iv. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5.</u> <u>That do not comply with the conditions, standards or terms of Rules 3.11.5.1 to 3.11.5.5 and is not a discretionary activity under Rule 3.11.5.6..."</u> AND AMEND PPC1 as necessary to clarify that land use change within a property or enterprise (>4.1 ha) that does not increase the total area within that property devoted to that land use beyond 4.1 hectares is not caught by this rule.</p>	
		V1PC1-1368	<p>Rule 3.11.5.7 Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10513, to the extent it is not modified by their V1 submission: [DELETE Rule 3.11.5.7 and REPLACE with a Rule that reads: <u>"Rule 3.11.5.7 – Non-complying Activity Rule – The use of land for farming activities and land use change</u> <u>The following activities are non-complying activities (requiring resource consent):</u> <u>1. The use of land for farming activities 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; and</u> <u>2. Any of the following changes in the use of land</u></p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p><u>from that which was occurring at 22 October 2016 within a property or enterprise location in the Waikato and Waipā catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares:</u></p> <p><u>i. Woody vegetation to farming activities; or</u> <u>ii. Any livestock grazing other than dairy farming to dairy farming; or</u> <u>iii. Arable cropping to dairy farming; or</u> <u>iv. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5.</u> <u>That do not comply with the conditions, standards or terms of Rules 3.11.5.1 to 3.11.5.5 and is not a discretionary activity under Rule 3.11.5.6..."</u></p> <p>AND AMEND PPC1 as necessary to clarify that land use change within a property or enterprise (>4.1 ha) that does not increase the total area within that property devoted to that land use beyond 4.1 hectares is not caught by this rule.]</p>	
		PC1-10517	<p>Schedule B Support the provision with amendments</p> <p>AMEND Schedule B Part c to read: "...c. The Nitrogen Reference Point must be calculated using the current <u>most recent</u> version of the OVERSEER Model (or any other model approved by the Chief Executive of the Waikato Regional Council)..."</p> <p>AND ADD a NEW Part A of Schedule B to read: "<u>...eA: Once a year, following the release of a new version of Overseer (or any other model approved by the Chief Executive of the Waikato Regional Council), the Nitrogen Reference Point will be recalculated by the Waikato Regional</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>Council (or for those registered to a Certified Industry Scheme, by the Certified Industry Scheme provider) using the latest version of that model and same data input file as was used to calculate the Nitrogen Reference Point submitted to Council in accordance with part e of this Schedule. When such a recalculation occurs, the resulting leaching rate becomes the Nitrogen Reference Point for the purposes of Rules 3.11.5.2 to 3.11.5.7..."</u></p> <p>AND AMEND Table 1 setting used for 'missing data' as follows:</p> <p>"In the absence of Nitrogen Referencing information being provided, the Waikato Regional Council will use appropriate default numbers for any necessary inputs to the Overseer Model. (sSuch default numbers will generally be around 75% of normal FMU average values for those inputs for the particular farm system type but <u>may be adjusted on the basis of farm production data which shall be provided in all cases where the complete suite of Nitrogen Referencing information is unavailable.</u>"</p> <p>AND REPLACE the setting that must be used in that cell corresponding to the 'Soil Description' line of Table 1 to read:</p> <p><u>"In any Farm Management Unit that has complete coverage of S Map, obtain soil description from the Link to S Map within Overseer.</u></p> <p><u>In any Farm Management Unit that does not have complete coverage of S Map use soil order from LRI 1:50,000 data or a soil map of the farm."</u></p>	
		V1PC1-1369	Schedule B Support with amendments	WPL supports and opposes the

			<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10517, to the extent it is not modified by their V1 submission:</p> <p>[AMEND Schedule B Part c to read: "...c. The Nitrogen Reference Point must be calculated using the current <u>most recent</u> version of the OVERSEER Model (or any other model approved by the Chief Executive of the Waikato Regional Council)..."</p> <p>AND ADD a NEW Part eA of Schedule B to read: <u>"...eA: Once a year, following the release of a new version of Overseer (or any other model approved by the Chief Executive of the Waikato Regional Council), the Nitrogen Reference Point will be recalculated by the Waikato Regional Council (or for those registered to a Certified Industry Scheme, by the Certified Industry Scheme provider) using the latest version of that model and same data input file as was used to calculate the Nitrogen Reference Point submitted to Council in accordance with part e of this Schedule. When such a recalculation occurs, the resulting leaching rate becomes the Nitrogen Reference Point for the purposes of Rules 3.11.5.2 to 3.11.5.7..."</u></p> <p>AND AMEND Table 1 setting used for 'missing data' as follows: "In the absence of Nitrogen Referencing information being provided, the Waikato Regional Council will use appropriate default numbers for any necessary inputs to the Overseer Model. (sSuch default numbers will generally be around 75% of normal FMU average values for those inputs); <u>for the particular farm system type but may be adjusted on the basis of farm production</u></p>	<p>submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p><u>data which shall be provided in all cases where the complete suite of Nitrogen Referencing information is unavailable.</u>"</p> <p>AND REPLACE the setting that must be used in that cell corresponding to the 'Soil Description' line of Table 1 to read:</p> <p><u>"In any Farm Management Unit that has complete coverage of S Map, obtain soil description from the Link to S Map within Overseer.</u></p> <p><u>In any Farm Management Unit that does not have complete coverage of S Map use soil order from LRI 1:50,000 data or a soil map of the farm."]</u></p>	
		PC1-12404	<p>Schedule 1</p> <p>Support the provision with amendments</p> <p>AMEND Schedule 1 part 5 to read:</p> <p>"...5. A description of the following:</p> <p>a. Actions, The property or enterprise's Nitrogen Reference Point timeframes and other measures to ensure that the diffuse discharge of nitrogen from the property or enterprise, as measured by that is not to be exceeded by the five three-year rolling average annual nitrogen loss as determined by the use of the current most recent version of OVERSEER, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified; or ..."</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-805	<p>Schedule 1</p> <p>Support with amendments</p> <p>AMEND Schedule 1, part 5 to read:</p> <p>5. A description of the following:</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own

			<p>(a) Actions <u>The property or enterprise's Nitrogen Reference Point timeframes and other measures to ensure that the diffuse discharge of nitrogen from the property or enterprise, as measured by that is not to be exceeded by the five three-year rolling average annual nitrogen loss as determined by the use of the current most recent version of OVERSEER, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified; or</u></p> <p><u>(b) for properties or enterprises that choose to be assessed using the Nitrogen Risk Scorecard, the farm data required to establish the reference grade as set out in Schedule BA and the Nitrogen Risk Scorecard assessment grade that is not to be exceeded on an annual basis; or</u></p> <p>(b_c) <u>Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is progressively reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026, except in the case of Rule 3.11.5.5.</u></p>	<p>submissions, and seeks that it should be disallowed.</p>
		PC1-10559	<p>Schedule 1 Support the provision with amendments</p> <p>AMEND Schedule 1 paragraph 5 to read: "This schedule applies to all farming activities, but it is acknowledged that some provisions will not be relevant to every farming activity. <u>Any management plan required by a condition of any resource consent authorising industrial or other wastewater irrigation shall be deemed to be Farm Environment Plan for the purposes of this schedule, provided that the management</u></p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p><u>plan addresses the relevant matters in Section A.</u>"</p> <p>AND ADD a NEW item 'g' to Section 2 (immediately above Section 3):</p> <p><u>"g. A description of any other wastewater irrigation or fertiliser management activities on the site including the use of fertilised replacements."</u></p>	
		V1PC1-1370	<p>Schedule 1</p> <p>Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10559, to the extent it is not modified by their V1 submission:</p> <p>[AMEND Schedule 1 paragraph 5 to read:</p> <p>"This schedule applies to all farming activities, but it is acknowledged that some provisions will not be relevant to every farming activity.</p> <p><u>Any management plan required by a condition of any resource consent authorising industrial or other wastewater irrigation shall be deemed to be Farm Environment Plan for the purposes of this schedule, provided that the management plan addresses the relevant matters in Section A.</u>"</p> <p>AND ADD a NEW item 'g' to Section 2 (immediately above Section 3):</p> <p><u>"g. A description of any other wastewater irrigation or fertiliser management activities on the site including the use of fertilised replacements."</u>]</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		V1PC1-812	<p>Glossary of Terms</p> <p>Support</p>	<p>WPL opposes the submission because it is not consistent with</p>

			<p>ADD a NEW definition to the Glossary of Terms to PPC1 called <u>50th percentile nitrogen leaching value</u> which shall read: <u>50th percentile nitrogen leaching value</u> <u>The 50th percentile value (units of kg N/ha/year) of all the Nitrogen Reference Point values for dairy farming properties and enterprises within each Freshwater Management Unit and which are received by the Waikato Regional Council by 1 November 2020, as determined by the Chief Executive of the Waikato Regional Council and published on the Waikato Regional Council website on or before 28 February 2021.</u></p>	<p>the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-10616	<p>Glossary of Terms Support the provision</p> <p>ADD to the Glossary of terms a definition of regionally significant infrastructure to read: <u>"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:</u> <u>a. Dairy manufacturing sites;</u> <u>b. Meat processing plants;</u> <u>c. Pulp and paper processing plants; and</u> <u>d. Mineral extraction activities."</u> AND ADD a NEW definition of 'effective hectares' to read: <u>"Effective hectares: means the area of a property or enterprise as measured in hectares which is used for the regular grazing of animals or growing of crops or activities ancillary to those uses and which specifically excludes indigenous</u></p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p><u>forest, plantation forest, closed canopy scrubland and protected wetlands.</u>"</p> <p>AND ADD a NEW definition of 'protected wetland' to read:</p> <p><u>"Protected wetland: for the purpose of the definition of 'effective hectares' means a wetland that is fenced to exclude stock or which is legally protected by a rule in a district or regional plan, condition of resource consent or other legally binding instrument such that it cannot be lawfully grazed, drained, cleared or otherwise modified without the consent of a local authority or third party and for which no such consent has been issued. This definition excludes any wetland constructed for the purpose of mitigating the effects of agricultural discharges on water quality."</u></p>	
		V1PC1-839	<p>Glossary of Terms Support</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10616, to the extent it is not modified by their V1 submission:</p> <p>[ADD to the Glossary of terms a definition of regionally significant infrastructure to read:</p> <p><u>"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:</u></p> <p><u>a. Dairy manufacturing sites;</u></p> <p><u>b. Meat processing plants;</u></p> <p><u>c. Pulp and paper processing plants; and</u></p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p><u>d. Mineral extraction activities."</u> AND ADD a NEW definition of 'effective hectares' to read: <u>"Effective hectares: means the area of a property or enterprise as measured in hectares which is used for the regular grazing of animals or growing of crops or activities ancillary to those uses and which specifically excludes indigenous forest, plantation forest, closed canopy scrubland and protected wetlands."</u> AND ADD a NEW definition of 'protected wetland' to read: <u>"Protected wetland: for the purpose of the definition of 'effective hectares' means a wetland that is fenced to exclude stock or which is legally protected by a rule in a district or regional plan, condition of resource consent or other legally binding instrument such that it cannot be lawfully grazed, drained, cleared or otherwise modified without the consent of a local authority or third party and for which no such consent has been issued. This definition excludes any wetland constructed for the purpose of mitigating the effects of agricultural discharges on water quality."]</u></p>	
		PC1-10573	<p>75th percentile nitrogen leaching value definition Support the provision with amendments</p> <p>AMEND Glossary of terms definition of the 75th percentile nitrogen leaching value to read: "...are received by the Waikato Regional Council by 31 March 2019, <u>as determined by the Chief Executive of the Waikato Regional Council and published on the Waikato Regional Council website on or before 20 June 2019.</u>"</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent</p>

				with the specific decisions sought by WPL in its own submissions.
		V1PC1-1371	<p>75th percentile nitrogen leaching value definition Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10573, to the extent it is not modified by their V1 submission:</p> <p>[AMEND Glossary of terms definition of the 75th percentile nitrogen leaching value to read: "...are received by the Waikato Regional Council by 31 March 2019, <u>as determined by the Chief Executive of the Waikato Regional Council and published on the Waikato Regional Council website on or before 20 June 2019.</u>"]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10580	<p>Nitrogen Reference Point definition Support the provision with amendments</p> <p>AMEND the Glossary of terms definition of Nitrogen Reference Point to read: "Nitrogen Reference Point: The nitrogen loss number (units of kg N/ha/year) that is derived <u>using the methodology specified in Schedule B. from an OVERSEER use protocol compliant OVERSEER file that describes the property or farm enterprise and farm practices in an agreed year or years developed by a Certified Farm Nutrient Advisor, using the current version of the OVERSEER model (or another model approved by the Council) for the property or enterprise at the 'reference' point in time.</u>"</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

		V1PC1-1373	<p>Nitrogen Reference Point definition Support with amendments</p> <p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10580, to the extent it is not modified by their V1 submission: [AMEND the Glossary of terms definition of Nitrogen Reference Point to read: "Nitrogen Reference Point: The nitrogen loss number (units of kg N/ha/year) that is derived <u>using the methodology specified in Schedule B. from an OVERSEER use protocol compliant OVERSEER file that describes the property or farm enterprise and farm practices in an agreed year or years developed by a Certified Farm Nutrient Advisor, using the current version of the OVERSEER model (or another model approved by the Council) for the property or enterprise at the 'reference' point in time."</u>]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
Fonterra Shareholders Council	72610	PC1-10638	<p>Policy 6 Support the provision with amendments</p> <p>AMEND Policy 6 to include an additional clause that sets out that it is generally acceptable for land use change where the effects are either neutral or reduce contaminants. AND AMEND Policy 6 so that it does not capture changes occurring as part of normal farming practice, and are otherwise managed by the Nitrogen Reference Point.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

		PC1-10641	<p>Rule 3.11.5.3 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.3 to ensure clarity and robustness.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10644	<p>Rule 3.11.5.7 Support the provision with amendments</p> <p>DELETE Rule 3.11.5.7 and replace with the following: <u>"Rule 3.11.5.7 – Non-complying Activity Rule – The use of land for farming activities and land use change</u> <u>The following activities are non-complying activities (requiring resource consent):</u> <u>1. The use of land for farming activities 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; and</u> <u>2. Any of the following 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 Waipa catchments, where prior to 1 July 2026 the change exceeds a total of 4.1</u></p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p><u>hectares:</u> <u>i. Woody vegetation to farming activities; or</u> <u>ii. Any livestock grazing other than dairy farming to dairy farming; or</u> <u>iii. Arable cropping to dairy farming; or</u> <u>iv. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5 that do not comply with the conditions, standards or terms of Rules 3.11.5.1 to 3.11.5.5 and is not a discretionary activity under Rule 3.11.5.6."</u> AND MAKE other amendments as necessary to clarify that land use change within a property or enterprise (>4.1 hectares) that does not increase the total area within that property devoted to that land use beyond 4.1 hectares is not caught by this rule.</p>	
		PC1-10645	<p>Schedule B Support the provision with amendments</p> <p>AMEND Schedule B by providing further detail with regards to the method that will manage the OVERSEER Model version changes.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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Genesis Energy Ltd	74052	PC1-8798	<p>Objective 4 Support the provision</p>	<p>WPL opposes the submission because it</p>

			RETAIN Objective 4 (in same or similar form).	is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-8736	Policy 1 Support the provision RETAIN Policy 1 (in same or similar form).	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
Genetic Technologies Ltd	73953	PC1-3231	Policy 1 Support the provision RETAIN Policy 1.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-3240	Policy 4 Support the provision with amendments AMEND Policy 4 to read: "Enabling activities with lower discharges... established while signalling further change may be required in the future..."	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific

				decisions sought by WPL in its own submissions.
		PC1-3252	AMEND Policy 6 to read: "Land use change consent applications ... phosphorus, sediment or microbial pathogens <u>or no increase above an accepted best practice level</u> will generally be granted."	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-3253	Policy 7 Support the provision RETAIN Policy 7.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-3256	Rule 3.11.5.2 Support the provision with amendments RETAIN Rule 3.11.5.2(1-3). AND AMEND 3.11.5.2(4)(c) with something along the lines of " <u>contamination of streams caused by the runoff of soil contaminants needs to be minimised. Permission to cultivate slope will be</u>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the

			<p><u>based on risk assessment using the Revised Universal Soil Equation and contained within the Farm Environment Plan</u>".</p> <p>AND ADD a clear definition of winter forage crops along the lines of: "<u>the grazing of single grazed forages (e.g. winter brassicas or beet) from April 1 to August 31 is prohibited. Ryegrass, either annual or perennial, is not considered a winter grazed crop.</u>"</p> <p>AND AMEND 3.11.5.2(4)(e)(i) to ensure that cultivation setback distances are based on cultivation type, crop type, soil type and paddock slope. Mitigation strategies need to include a minimum setback of 1 metre and up to 5 metres of either grass or riparian planting depending on outcomes of the Revised Universal Soil Loss Equation calculation, and should be written into the Farm Environment Plan.</p>	<p>submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-3272	<p>Rule 3.11.5.4 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.4 to clarify whether Farm Environment Plan implementation is at an enterprise or property level. AND CLARIFY how Farm Environment Plans will be managed for enterprises that have multiple lease blocks. AND AMEND Rule 3.11.5.4(1) so that the timeframes for properties greater than 20 hectares (excluding vegetable growers greater than 4 hectares) are as follows: Priority 1 Sub-catchments 31 December for all and those properties above the 75th percentile nitrogen leaching value; Priority 2 Sub-Catchments 31 December 2023; and Priority 3 Sub-catchments 1 January 2026 for those properties between 4 hectares and 20</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			hectares that are not provided for in Rule 3.11.5.2.	
		PC1-3276	<p>Rule 3.11.5.7 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.7 to ensure that land use change is a permitted activity if the proposed change in land use results in: nitrogen loss being below the 75th percentile Nitrogen Reference Point, and lower than the Nitrogen Reference Point for the previous use; phosphorus and other soil contaminant (E.coli and other pathogens) losses are all lower than the previous land use; all waterways are fenced more than 3 metres from the waterway margin; and all stock are excluded immediately.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-3219	<p>Schedule B Support the provision with amendments</p> <p>AMEND in Schedule B the definition of a Certified Farm Nutrient Advisor to ensure that the Advisor as completed an advanced level of nutrient training and has had at least 2 years' experience in nutrient management/farm systems advice. AND ADD to Schedule B(b) the following words: <u>"a property scale Nitrogen Reference Point to be established by modelling current nutrient losses from each property, with no property being allowed to exceed either its Nitrogen Reference Point for either the 14/15 or 15/16 season OR where the information exists and is complete, its 5-year rolling average reference point in the future and higher dischargers being required to reduce their nutrient losses."</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			AND AMEND Schedule B(c) to ensure that the Nitrogen Reference Point must be calculated using the OVERSEER Model once the changes for cropping have been completed and there is general agreement that it should be used, OR some other model approved by the Chief Executive of the Waikato Regional Council.	
		PC1-12415	<p>Schedule 1 Support the provision</p> <p>Schedule 1 - AMEND so that Table 3.11-1 clearly identifies the priority contaminants for sub-catchments</p> <p>AND AMEND A.(2)(b)(ii) to the effect of "provision of 1 metre or greater grazing setback depending on level of risk of contaminants entering water bodies"</p> <p>AND AMEND A.(2)(b)(iii) to read: "the provision of a minimum of 1 metre cultivation setbacks of 5 metres <u>with actual distance based upon the assessed risk of contaminants entering the water body.</u>"</p> <p>AND AMEND to define the meaning of the word 'avoided' in A.(2)(f)(i). If the 'avoid' means 'prohibit' then AMEND to read as follows: "The identification of slopes over 15 degrees and how cultivation of them will be avoided; unless managed to minimise contaminant discharges to water bodies from that cultivation can be avoided; and"</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-12416	<p>Schedule 1 Support the provision</p> <p>RETAIN Schedule 1, A.(5).</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own

				submissions, and seeks that it should be disallowed.
		PC1-3334	<p>Table 3.11-1 Support the provision with amendments</p> <p>AMEND Table 3.11-1 to state the priority attributes that need addressing in each sub-catchment.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-3290	<p>Certified Farm Nutrient Advisor definition Support the provision with amendments</p> <p>AMEND to ensure that Certified Farm Nutrient Advisors have completed an advanced level of nutrient management training and have had at least 2 years' experience in nutrient management/farm systems advice.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-3338	Enterprise definition	WPL opposes the

			Support the provision with amendments AMEND the Definition of enterprise/s to: " <u>one or more parcels of land within the same sub-catchment</u> ".	submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
H				
Hancock Forest Management (NZ) Ltd	73724	PC1-5362	Objective 1 Oppose the provision with amendments AMEND Objective 1 to read: "By 2096, discharges of nitrogen, phosphorus sediment and microbial pathogens to land and water result in achievement of the restoration of the 80 year water quality attribute target goals <u>in Table 3.11-1. By 2066 discharges of nitrogen, phosphorus sediment and microbial pathogens to land and water result in 30 percent of the restoration and protection of the 80 year water quality attribute goals in Table 3.11-1.</u> " AND AMEND by including the concept of the three well-beings into Objective 1.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-5374	Objective 3 Oppose the provision with amendments AMEND Objective 3 so that improvements are required now to set the region on a firm trajectory toward achieving the 80 year goals, with measurable improvements in the first ten years and implementation of actions that are aligned with the long term goals.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific

				decisions sought by WPL in its own submissions.
		PC1-5377	<p>Objective 4 Oppose the provision with amendments</p> <p>RETAIN the reference to the staged approach in Objective 4. AMEND Objective 4 by clarifying that actions will be required to achieve Objective 1 targets and that these actions need to be implemented within the life of PPC1.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-5378	<p>Policy 1 Support the provision with amendments</p> <p>AMEND Policy 1 to reflect amendments to the rules requiring all farming activities to adopt the Best Practicable Option.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-5608	Policy 4	WPL supports and

			<p>Support the provision with amendments</p> <p>AMEND Policy 4 to enable low discharge land uses such as forestry.</p> <p>AND AMEND to ensure that mitigation actions are applied to all farming activities taking into account relative contributions and risk.</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-5633	<p>Policy 6</p> <p>Oppose the provision</p> <p>DELETE Policy 6.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-5662	<p>Policy 7</p> <p>Support the provision with amendments</p> <p>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.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by</p>

				WPL in its own submissions.
		PC1-5762	<p>Method 3.11.4.7 Support the provision with amendments</p> <p>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 of diffuse discharges including...</u>"</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-5764	<p>Method 3.11.4.8 Oppose the provision with amendments</p> <p>REPLACE Method 3.11.4.8 with the implementation of actions within the life of PPC1.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-5767	<p>Method 3.11.4.11 Support the provision with amendments</p>	WPL supports and opposes the

			AMEND Method 3.11.4.11 as required to reflect the alternative approach proposed in the submission.	submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-5771	<p>Rule 3.11.5.2 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.2 to include region wide Best Practicable Options to be followed on all rural properties, including those under 20 hectares.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-5773	<p>Rule 3.11.5.3 Oppose the provision</p> <p>AMEND Rule 3.11.5.3 to a Best Practicable Option approach with permitted activity conditions above which a consent would be required.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and

				seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-5774	<p>Rule 3.11.5.4 Oppose the provision</p> <p>AMEND Rule 3.11.5.4 so that farming activities are permitted subject to application of the Best Practicable Option. AND AMEND by incorporating the minimum standards in the Farm Environment Plan into the rules, including the information requirements contained in the Farm Environment Plan. AND AMEND by removing the reliance on the Nitrogen Reference Points and OVERSEER as a method for assessing compliance.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-5780	<p>Rule 3.11.5.5 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.5 to reflect the approach described in this submission on the farming rules.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific

				decisions sought by WPL in its own submissions.
		PC1-5781	<p>Rule 3.11.5.6 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.6 to the matter for control to ensure that the Best Practicable Options approach is applied to applicants for a resource consent.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-5782	<p>Rule 3.11.5.7 Oppose the provision</p> <p>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.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-5786	<p>Schedule B Oppose the provision</p> <p>DELETE Schedule B and reference to the Nitrogen Reference Point OR AMEND the approach such that Nitrogen Reference Points are used as an information gathering tool only.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.

		PC1-5801	<p>Table 3.11-1 Oppose the provision with amendments</p> <p>AMEND Table 3.11-1 to ensure attribute targets fairly allocate water quality expectations across all catchments based on natural characteristics, rather than rewarding land users in heavily degraded catchments with less ambitious targets.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
Horticulture New Zealand (HortNZ)	73801	PC1-9939	<p>Objective 1 Support the provision with amendments</p> <p>AMEND Objective 1 to read: "By 2096, <u>the adverse effects from</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water <u>are reduced resulting</u> in achievement of the <u>desired state of intrinsic freshwater values for the Waikato River, represented by the restoration and protection of</u> the 80-year water quality attribute targets in Table 3.11-1."</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1622	<p>Objective 1 Support with amendments</p> <p>APPLY decision requested in accordance with the</p>	<p>WPL supports and opposes the submission because it is generally consistent</p>

			submitter's PPC1 submission PC1-9939: [AMEND Objective 1 to read: "By 2096, <u>the adverse effects from</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water <u>are reduced</u> <u>resulting</u> in achievement of the <u>desired state of intrinsic freshwater values for the Waikato River, represented by the restoration and protection of</u> the 80-year water quality attribute targets in Table 3.11-1."]	with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-9945	Objective 3 Support the provision with amendments AMEND Objective 3 to read: "... A ten percent change towards the long term water quality attribute improvements is indicated by the short term water quality attribute targets in Table 3.11-1 <u>or achievement of the contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX.</u> " For the purpose of this relief the submitter has produced a 10-year Sub-catchment Load Target Table (Schedule 1C Table XX) and attached it to proposed relief as part of a new Schedule 1C. As an alternative where it is mentioned in this submission, it could be inserted as a new part of Table 3.11-1.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1624	Objective 3 Support with amendments APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9945: [AMEND Objective 3 to read: "... A ten percent change towards the long term	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and

			<p>water quality attribute improvements is indicated by the short term water quality attribute targets in Table 3.11-1 <u>or achievement of the contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX.</u>"</p> <p>For the purpose of this relief the submitter has produced a 10-year Sub-catchment Load Target Table (Schedule 1C Table XX) and attached it to proposed relief as part of a new Schedule 1C. As an alternative where it is mentioned in this submission, it could be inserted as a new part of Table 3.11-1.]</p>	<p>seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10005	<p>Objective 4 Oppose the provision with amendments</p> <p>AMEND Objective 4 to read: "...a. considering the values and uses when taking action to achieve the attribute targets for the Waikato and Waipā Rivers in Table 3.11-1 <u>or achievement of the contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX;</u> and b. recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed to meet Objective 1 <u>and</u> c. <u>recognising that this plan change is transitional, to provide time to develop the tools required to more efficiently allocate responsibility for achieving contaminant reductions targets in the long-term</u> d. <u>enabling the production of contaminant accounting frameworks that support robust measurement of progress to achieving the long-term and short-term target states for attributes</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<u>and sub-catchment load limits by more accurately identifying property level responsibilities for contaminant reduction."</u>	
		V1PC1-1602	<p>Objective 4 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10005: [AMEND Objective 4 to read: "...a. considering the values and uses when taking action to achieve the attribute targets for the Waikato and Waipā Rivers in Table 3.11-1 <u>or achievement of the contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX</u>; and b. recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed to meet Objective 1 <u>and</u> c. <u>recognising that this plan change is transitional, to provide time to develop the tools required to more efficiently allocate responsibility for achieving contaminant reductions targets in the long-term</u> d. <u>enabling the production of contaminant accounting frameworks that support robust measurement of progress to achieving the long-term and short-term target states for attributes and sub-catchment load limits by more accurately identifying property level responsibilities for contaminant reduction."</u>]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10050	Policy 1 Support the provision with amendments	WPL supports and opposes the submission because it

			<p>AMEND Policy 1 to achieve the intent of the following revisions: "a. Enabling activities with a low level of contaminant discharge to water bodies provided those discharges do not increase; and b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce <u>the effect of their discharges through on-farm and/or off-farm actions;</u> <u>ba. Enabling collective action at a catchment scale by groups seeking to manage discharges as a single entity; and</u> <u>bb. Providing criteria for the approval of natural resource accounting systems used to enable catchment or sub-catchment based approaches;</u> <u>bc. Providing a table of ten-year sub-catchment load targets for the four contaminants (Schedule C Table XX),</u> c. Progressively excluding cattle, horses, deer and pigs from rivers, stream, drains wetlands and lakes."</p>	<p>is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1629	<p>Policy 1 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10050: [AMEND Policy 1 to achieve the intent of the following revisions: "a. Enabling activities with a low level of contaminant discharge to water bodies provided those discharges do not increase; and b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce <u>the effect of their discharges through on-farm and/or off-farm actions;</u> <u>ba. Enabling collective action at a catchment</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>scale by groups seeking to manage discharges as a single entity; and bb. Providing criteria for the approval of natural resource accounting systems used to enable catchment or sub- catchment based approaches;</u></p> <p><u>bc. Providing a table of ten-year sub-catchment load targets for the four contaminants (Schedule C Table XX).</u></p> <p>c. Progressively excluding cattle, horses, deer and pigs from rivers, stream, drains wetlands and lakes."]</p>	
		PC1-10055	<p>Policy 4 Support the provision with amendments</p> <p>RETAIN Policy 4 AND AMEND the definition of commercial vegetable cropping by deleting reference to asparagus.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1631	<p>Policy 4 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10055 [RETAIN Policy 4 AND AMEND the definition of commercial vegetable cropping by deleting reference to asparagus.]</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10057	<p>Policy 6 Support the provision with amendments</p> <p>AMEND Policy 6 to read: "Except as provided for in Policy 16, land use change consent applications under <u>Rule 3.11.5.7</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its

			<p>that demonstrate <u>on the balance</u> an increase in diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally not be granted.</p> <p>Land use change Consent applications that demonstrate <u>on the balance</u> clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally be granted."</p>	<p>own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1632	<p>Policy 6 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10057: [AMEND Policy 6 to read: "Except as provided for in Policy 16, land use change consent applications under <u>Rule 3.11.5.7</u> that demonstrate <u>on the balance</u> an increase in diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally not be granted. Land use change Consent applications that demonstrate <u>on the balance</u> clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally be granted."]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10070	<p>Policy 7 Oppose the provision</p> <p>AMEND Policy 7 to read: "Any future allocation should consider the following principles: a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be</p>

			<p>the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes of allocation); and</p> <p>b. Allowance for flexibility of development of tangata whenua ancestral land; and</p> <p>c. Minimise social disruption and costs in the transition to the 'land suitability' approach; and</p> <p>d. Future allocation decisions should take advantage of new data and knowledge. And;</p> <p><u>e. Having regard for the finite nature of High Class Soils</u></p> <p><u>f. Incorporating the principle of 'polluter pays'; meaning that when assessed across the balance of contaminant discharges to water those having the greatest effect bear a proportionally greater cost of the transition."</u></p>	<p>allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1600	<p>Policy 7 Oppose</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10070: [AMEND Policy 7 to read: "Any future allocation should consider the following principles: a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes of allocation); and b. Allowance for flexibility of development of tangata whenua ancestral land; and c. Minimise social disruption and costs in the transition to the 'land suitability' approach; and</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>d. Future allocation decisions should take advantage of new data and knowledge. And;</p> <p>e. <u>Having regard for the finite nature of High Class Soils</u></p> <p>f. <u>Incorporating the principle of 'polluter pays'; meaning that when assessed across the balance of contaminant discharges to water those having the greatest effect bear a proportionally greater cost of the transition.'</u>"]</p>	
		PC1-10108	<p>Method 3.11.4.5 Support the provision with amendments</p> <p>AMEND Method 3.11.4.5: "Waikato Regional Council will work with others to develop sub-catchment scale plans and <u>decision support tools</u> (where a catchment plan <u>or tool</u> does not already exist) where it has been shown to be required. Sub-catchment scale planning will:</p> <p>a. Identify the causes of current water quality decline, identify cost-effective measures to bring about reductions in contaminant discharges, and coordinate the reductions required at a property, enterprise and sub-catchment scale (including recommendations for funding where there is a public benefit identified).</p> <p>b. Align works and services to reduce nitrogen, phosphorus, sediment and microbial pathogen discharges including riparian management, targeted reforestation, constructed wetlands, sediment traps and sediment detention bunds.</p> <p>c. Assess and determine effective and efficient placement of constructed wetlands at a sub-</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>catchment scale to improve water quality.</p> <p>d. Support research that addresses the management of wetlands, including development of techniques to monitor ecological change and forecasting evolution of wetland characteristics resulting from existing land use in the wetland catchments.</p> <p>e. Integrate the regulatory requirements to fence waterways with the requirements for effective drainage scheme management.</p> <p>f Coordinate funding of mitigation work by those contributing to water quality degradation, in proportion to that contribution.</p> <p>g. Utilise public funds to support edge of field or catchment scale mitigations where those mitigations provide significant public benefit.</p> <p><u>h. In support of method 3.11.4.7, utilise (and coordinate the management of) public funds to share the cost of constructing decision support tools meeting the criteria specified in Schedule 1C Table XX."</u></p>	
		PC1-10110	<p>Method 3.11.4.7 Support the provision with amendments</p> <p>AMEND Method 3.11.4.7 to read: "a. Implementing processes that will support the setting of property or enterprise-level diffuse discharge limits in the future. b. Researching <u>and making publicly available</u>: i. The quantum of contaminants that can be discharged at a sub-catchment and Freshwater</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this</p>

			<p>Management Unit scale while meeting the Table 3.11-1 water quality attribute targets and/or sub-catchment load targets identified Schedule 1C Table XX.</p> <p>ii. Methods to categorise and define 'land suitability'.</p> <p>iii. Tools for measuring or modelling discharges from individual properties, enterprises and sub-catchments, and how this can be related to the Table 3.11-1 water quality attribute targets and/or sub-catchment load targets identified Schedule 1C Table XX.</p> <p><u>c. Prior to Jan 2019, by working with the Foundation of Arable Research, Horticulture New Zealand and The Pukekohe Vegetable Growers Association to develop a proxy nitrogen reference point for enterprises managing multiple properties and crops using a model or method approved by the Chief Executive of Waikato Regional Council."</u></p>	would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1637	<p>Method 3.11.4.7 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10110: [AMEND Method 3.11.4.7 to read: "a. Implementing processes that will support the setting of property or enterprise-level diffuse discharge limits in the future. b. Researching <u>and making publicly available</u>: i. The quantum of contaminants that can be discharged at a sub-catchment and Freshwater Management Unit scale while meeting the Table 3.11-1 water quality attribute targets and/or sub-catchment load targets identified Schedule 1C Table XX.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>ii. Methods to categorise and define 'land suitability'.</p> <p>iii. Tools for measuring or modelling discharges from individual properties, enterprises and sub-catchments, and how this can be related to the Table 3.11-1 water quality attribute targets <u>and/or sub-catchment load targets identified Schedule 1C Table XX.</u></p> <p>c. <u>Prior to Jan 2019, by working with the Foundation of Arable Research, Horticulture New Zealand and The Pukekohe Vegetable Growers Association to develop a proxy nitrogen reference point for enterprises managing multiple properties and crops using a model or method approved by the Chief Executive of Waikato Regional Council.</u>"]</p>	
		PC1-10111	<p>Method 3.11.4.8</p> <p>RETAIN Method 3.11.4.8.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		V1PC1-1597	<p>Method 3.11.4.8</p> <p>APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-10111: [RETAIN Method 3.11.4.8.]</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-10113	<p>Method 3.11.4.10</p> <p>Support the provision with amendments</p>	<p>WPL supports and opposes the</p>

			<p>AMEND Method 3.11.4.10 to read: "Waikato Regional Council will establish and operate a publicly available accounting system and monitoring in each Freshwater Management Unit, including:</p> <ul style="list-style-type: none"> a. Collecting information on nitrogen, phosphorus, sediment and microbial pathogen levels in the respective fresh water bodies in each Freshwater Management Unit from: <ul style="list-style-type: none"> i. Council's existing river monitoring network; and ii. Sub-catchments that are currently unrepresented in the existing monitoring network; and iii. Lake Freshwater Management Units. b. Using the information collected to establish the baseline data for compiling a monitoring plan and to assess progress towards achieving the Table 11-1 water quality attribute targets and c. Using state of the environment monitoring data including biological monitoring tools such as the Macroinvertebrate Community Index to provide the basis for identifying and reporting on long-term trends; and <u>ca. Produce a framework model for the greater Waikato River and surrounding land using the best available data, that can be adapted to include new decision support tools at the sub-catchment level.</u> d. An information and accounting system for the diffuse discharges from properties and enterprises that supports the management of nitrogen, phosphorus, sediment 	<p>submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			and microbial pathogens diffuse discharges at an <u>sub-catchment</u> , enterprise or property scale."	
		PC1-10114	Method 3.11.4.11 Support the provision RETAIN Method 3.11.4.11	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1611	Method 3.11.4.11 Support APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10114: [RETAIN Method 3.11.4.11]	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10117	Rule 3.11.5.5 Support the provision with amendments AMEND Rule 3.11.5.5 to read: "3.11.5.5 Controlled Activity Rule - <u>Discharge of contaminants from</u> existing commercial vegetable production/Te Ture mō ngā Mahi ka ā ta Whakahaerehia- Te whakatupu hua whenua ā -arumoni o te wa nei The use of land for commercial vegetable production and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land <u>from commercial vegetable production</u> in circumstances which may result in those contaminants entering water, is a permitted activity until 1 January 2020, from	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>which date it shall be a controlled activity (requiring resource consent) subject to the following standards and terms:</p> <p>a. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</p> <p>b. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and provided to the Waikato Regional Council at the time the resource consent application is lodged:</p> <p><u>i. in conformance with Schedule B; or</u></p> <p><u>ii. Through use of a proxy farm system; to approximate the nitrogen reference, is produced for the property, enterprise or catchment collective and provided to the Waikato Regional Council at the time the resource consent application is lodged;</u> and</p> <p>c. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and</p> <p>d. The land use is registered to a Certified Industry Scheme; and</p> <p>e. The areas of land, and their locations broken down by sub-catchments [refer to Table 3.11-2], that were <u>are</u> used for commercial vegetable production within the property or enterprise each year in the period 1 July 2006 to 30 June 2016, together with the maximum area of land used for commercial vegetable production within <u>the period 1 July 2006 to 30 June 2016</u> that period, shall be provided to the Council; and</p> <p>f. The total area of land <u>across all sub-catchments grown in</u> for which consent is sought for commercial vegetable production must not exceed the maximum land area of the property or enterprise that was used</p>	
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			<p>for commercial vegetable production during the period 1 July 2006 to 30 June 2016; and</p> <p>...</p> <p>h. A Farm Environment Plan for the property or enterprise prepared in conformance with Schedule 1B and approved by a Certified Farm Environment Planner (<u>commercial vegetable crops</u>) is provided to the Waikato Regional Council at the time the resource consent application is lodged.</p> <p>Matters of Control Waikato Regional Council reserves control over the following matters:</p> <p>...</p> <p>iv. The actions and timeframes to ensure that the diffuse discharge of nitrogen <u>from activities existing prior to 2016</u> do not increase beyond the Nitrogen Reference Point for the property or enterprise.</p> <p>...</p> <p>Advisory notes: Under section 20A(2) of the RMA a consent must be applied for within 6 months of 1 January 2020, namely by 1 July 2020.</p> <p><u>Consents will generally be granted for a term not less than 15 years."</u></p>	
		V1PC1-894	<p>Rule 3.11.5.5</p> <p>AMEND Rule 3.11.5.5 as follows: "3.11.5.5 Controlled Activity Rule - <u>Discharge of contaminants from</u> existing commercial vegetable production/Te Ture mō ngā Mahi ka ā ta Whakahaerehia- Te whakatupu hua whenua ā -arumoni o te wa nei The use of land for commercial vegetable production and the associated diffuse discharge</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this</p>

			<p>of nitrogen, phosphorus, sediment and microbial pathogens onto or into land <u>from commercial vegetable production</u> in circumstances which may result in those contaminants entering water, is a permitted activity until 1 January 2020, from which date it shall be a controlled activity (requiring resource consent) subject to the following standards and terms:”</p> <p>AND AMEND as follows:</p> <p>b. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and provided to the Waikato Regional Council at the time the resource consent application is lodged:</p> <p><u>i. in conformance with Schedule B; or</u></p> <p><u>ii. Through use of a proxy farm system; to approximate the nitrogen reference, is produced for the property, enterprise or catchment collective and provided to the Waikato Regional Council at the time the resource consent application is lodged; and ...</u></p> <p>e. The areas of land, and their locations broken down by sub-catchments [refer to Table 3.11-2], that were <u>are</u> used for commercial vegetable production within the property or enterprise each year in the period 1 July 2006 to 30 June 2016, together with the maximum area of land used for commercial vegetable production within <u>the period 1 July 2006 to 30 June 2016</u> that period, shall be provided to the Council; and</p> <p>f. The total area of land <u>across all sub-catchments grown in</u> for which consent is sought</p> <p>...</p> <p>iv. The actions and timeframes to ensure that the diffuse discharge of nitrogen <u>from activities existing prior to 2016</u> do not increase beyond the Nitrogen Reference Point for the property or</p>	<p>would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p>enterprise. Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected persons. <u>Consents will generally be granted for a term not less than 15 years.</u>"</p>	
		V1PC1-1639	<p>Rule 3.11.5.5 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10117: [AMEND Rule 3.11.5.5 to read: "3.11.5.5 Controlled Activity Rule - <u>Discharge of contaminants from</u> existing commercial vegetable production/Te Ture mō ngā Mahi ka ā ta Whakahaerehia- Te whakatupu hua whenua ā -arumoni o te wa nei The use of land for commercial vegetable production and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land <u>from commercial vegetable production</u> in circumstances which may result in those contaminants entering water, is a permitted activity until 1 January 2020, from which date it shall be a controlled activity (requiring resource consent) subject to the following standards and terms: a. The property is registered with the Waikato Regional Council in conformance with Schedule A; and b. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and provided to the Waikato Regional Council at the time the resource consent application is lodged:</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>i. <u>in conformance with Schedule B; or</u> ii. <u>Through use of a proxy farm system; to approximate the nitrogen reference, is produced for the property, enterprise or catchment collective and provided to the Waikato Regional Council at the time the resource consent application is lodged; and</u> c. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and d. The land use is registered to a Certified Industry Scheme; and e. The areas of land, and their locations broken down by sub-catchments [refer to Table 3.11-2], that were <u>are</u> used for commercial vegetable production within the property or enterprise each year in the period 1 July 2006 to 30 June 2016, together with the maximum area of land used for commercial vegetable production within <u>the period 1 July 2006 to 30 June 2016</u> that period, shall be provided to the Council; and f. The total area of land <u>across all sub-catchments grown in</u> for which consent is sought for commercial vegetable production must not exceed the maximum land area of the property or enterprise that was used for commercial vegetable production during the period 1 July 2006 to 30 June 2016; and ... h. A Farm Environment Plan for the property or enterprise prepared in conformance with Schedule 1B and approved by a Certified Farm Environment Planner (<u>commercial vegetable crops</u>) is provided to the Waikato Regional Council at the time the resource consent application is lodged.</p> <p>Matters of Control Waikato Regional Council</p>	
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			<p>reserves control over the following matters:</p> <p>...</p> <p>iv. The actions and timeframes to ensure that the diffuse discharge of nitrogen <u>from activities existing prior to 2016</u> do not increase beyond the Nitrogen Reference Point for the property or enterprise.</p> <p>...</p> <p>Advisory notes: Under section 20A(2) of the RMA a consent must be applied for within 6 months of 1 January 2020, namely by 1 July 2020.</p> <p><u>Consents will generally be granted for a term not less than 15 years.</u>"]</p>	
		PC1-10149	<p>Rule 3.11.5.6 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.6 to read: "Rule 3.11.5.6 - Restricted Discretionary Activity Rule - The use of land for <u>Discharges from</u> farming activities <u>Discharges related to</u> the use of land for farming activities that <u>either</u>:</p> <p>a. does not <u>cannot</u> comply with the conditions, standard or terms of Rules 3.11.5.1 to 3.11.5.5 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 restricted discretionary activity (requiring resource consent); or</p> <p><u>b. is for new commercial vegetable cropping that can demonstrate a lesser effect from the contaminant discharge compared with the existing activity (when the diffuse discharges of</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>nitrogen, phosphorus, sediment and microbial pathogens are considered together</u>); <u>Is a restricted discretionary activity (requiring resource consent).</u> Waikato Regional Council restricts its discretion over the following matters:</p> <ul style="list-style-type: none"> i. Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers. ii. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens. iii. The need for and the content of a Farm Environment Plan. iv. The term of the resource consent. v. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent. vi. The time frame and circumstances under which the consent conditions may be reviewed. vii. The matters addressed by Schedules A, B and C. <u>viii. With respect to applications made under 3.11.5.6(b), the relevant clauses of Policy 3 (except Policy 3(b)).</u> <p>Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected persons."</p>	
		V1PC1-902	<p>Rule 3.11.5.6</p> <p>AMEND Rule 3.11.5.6 as follows: Rule 3.11.5.6 - Restricted Discretionary Activity Rule - The use of land for <u>Discharges from</u> farming activities AND ADD under the following paragraph: The use of the land for farming activities that does not comply with the conditions, standard or</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be</p>

		<p>terms of Rules 3.11.5.1 to 3.11.5.5 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 restricted discretionary activity (requiring resource consent).</p> <p><u>Discharges related to the use of land for farming activities that either:</u></p> <p>a) <u>cannot comply with the conditions, standard or terms of Rules 3.11.5.1 to 3.11.5.5 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; or</u></p> <p>b) <u>is for new commercial vegetable cropping that can demonstrate a lesser effect from the contaminant discharge compared with the existing activity (when the diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens are considered together).</u></p> <p>AND ADD an additional sub-clause to read: <u>viii. With respect to applications made under 3.11.5.6 b) the relevant clauses of Policy 3.</u></p> <p><u>Footnote: 7 All except clause b of Policy 3.</u></p> <p>AND ADD a NEW Rule: <u>Rule 3.11.5.X - Restricted Discretionary Activity Rule - The management of contaminants from farming activities by a catchment collective. The management of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens onto or into land by a catchment collective in circumstances which may result in those contaminants entering water is a restricted discretionary activity (requiring resource consent).</u></p> <p><u>Waikato Regional Council restricts its discretion</u></p>	<p>allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p>over the following matters:</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. Achieving the contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX.</u> <u>iv. The matter set out in Schedule 1C Catchment Collectives.</u> <u>v. The term of the resource consent. Minimum 15 years.</u> <u>vi. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent.</u> <u>vii. The time frame and circumstances under which the consent conditions may be reviewed.</u> <u>viii. The matters addressed by Schedules A and C and the Nitrogen Reference Point being:</u> <ul style="list-style-type: none"> <u>1. In conformance with Schedule B; or</u> <u>2. Determined through use of proxy farm systems to approximate the nitrogen reference for the catchment collective; or</u> <u>3. Through modelling a series of collective mitigations that are estimated sufficient to meet the load limit targets, in accordance with the criteria in schedule 1C.</u> <p><u>Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected persons.</u></p> <p>OR if Restricted Discretionary status is not deemed appropriate, AMEND to provide for these activities as full Discretionary rules.</p>	
		V1PC1-1640	Rule 3.11.5.6	WPL supports and

			<p>Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10149: [AMEND Rule 3.11.5.6 to read: "Rule 3.11.5.6 - Restricted Discretionary Activity Rule - The use of land for <u>Discharges from</u> farming activities <u>Discharges related to</u> the use of land for farming activities that <u>either:</u> <u>a. does not cannot</u> comply with the conditions, standard or terms of Rules 3.11.5.1 to 3.11.5.5 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 restricted discretionary activity (requiring resource consent); or <u>b. is for new commercial vegetable cropping that can demonstrate a lesser effect from the contaminant discharge compared with the existing activity (when the diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens are considered together);</u> <u>Is a restricted discretionary activity (requiring resource consent).</u></p> <p>Waikato Regional Council restricts its discretion over the following matters:</p> <ol style="list-style-type: none"> i. Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers. ii. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens. iii. The need for and the content of a Farm Environment Plan. iv. The term of the resource consent. v. The monitoring, record keeping, reporting and information provision requirements for the holder 	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p>of the resource consent.</p> <p>vi. The time frame and circumstances under which the consent conditions may be reviewed.</p> <p>vii. The matters addressed by Schedules A, B and C.</p> <p>viii. <u>With respect to applications made under 3.11.5.6(b), the relevant clauses of Policy 3 (except Policy 3(b)).</u></p> <p>Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected persons."]</p>	
		PC1-10169	<p>Rule 3.11.5.7 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.7(4) to read: "4. Any land use to commercial vegetable production <u>that cannot be provided for through Rule 3.11.5.5, 3.11.5.6(b), or 3.11.5.X</u> except as provided for under standard and term g. of Rule 3.11.5.5"</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1603	<p>Rule 3.11.5.7 Oppose the provision with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10169: [AMEND Rule 3.11.5.7(4) to read: "4. Any land use to commercial vegetable production <u>that cannot be provided for through</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the</p>

			<u>Rule 3.11.5.5, 3.11.5.6(b), or 3.11.5.X except as provided for under standard and term g. of Rule 3.11.5.5"]</u>	submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10190	<p>Schedule B Oppose the provision</p> <p>AMEND Schedule B to ensure that alternatives to the OVERSEER Model are available to calculate the Nitrogen Reference Point for the arable and commercial vegetable sector. AND AMEND to simplify the protocol for the use of Overseer in the following manner: "A. The Nitrogen Reference Point must be calculated by <u>a person who is certified as being competent to do so, with a certification being approved by the Chief Executive of the Waikato Regional Council</u> Certified Farm Nutrient Advisor to determine the amount of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point shall be determined through the Rule 3.11.5.7 consent process. B. The Nitrogen Reference Point shall be the highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period specified in clause f), except for commercial vegetable production in which case the Nitrogen Reference Point shall be the average annual nitrogen leaching loss <u>in kilograms per hectare</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p><u>per year</u> during the reference period.</p> <p>C. The Nitrogen Reference Point must be calculated using the current version of the OVERSEER® Model, <u>APSIM or SPASMO</u> (or any other model approved by the Chief Executive of the Waikato Regional Council).</p> <p>D. The Nitrogen Reference Point data shall comprise the electronic output file from the OVERSEER®, <u>APSIM or SPASMO</u>, or other approved model, and where the OVERSEER Model is used, it must be calculated using the OVERSEER Best Practice Data Input Standards 2016, with the exceptions and inclusions set out in Schedule B Table 1.</p> <p>...</p> <p>G. The following records (where relevant to the land use undertaken on the property or enterprise) must be retained and provided <u>available for inspection by</u> to Waikato Regional Council at its request:</p> <p>i. Stock numbers as recorded in annual accounts together with stock sale and purchase invoices;</p> <p>...</p> <p>vi. <u>The representative range of cGrops</u> grown on the land; and</p> <p>vii. Horticulture crop diaries and NZGAP records."</p>	
		V1PC1-1601	<p>Schedule B Oppose</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10190: [AMEND Schedule B to ensure that alternatives to the OVERSEER Model are available to calculate the Nitrogen Reference Point for the arable and commercial vegetable sector. AND AMEND to simplify the protocol for the use</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this</p>

			<p>of Overseer in the following manner:</p> <p>"A. The Nitrogen Reference Point must be calculated by <u>a person who is certified as being competent to do so, with a certification being approved by the Chief Executive of the Waikato Regional Council</u> Certified Farm Nutrient Advisor to determine the amount of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point shall be determined through the Rule 3.11.5.7 consent process.</p> <p>B. The Nitrogen Reference Point shall be the highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period specified in clause f), except for commercial vegetable production in which case the Nitrogen Reference Point shall be the average annual nitrogen leaching loss <u>in kilograms per hectare per year</u> during the reference period.</p> <p>C. The Nitrogen Reference Point must be calculated using the current version of the OVERSEER® Model, <u>APSIM or SPASMO</u> (or any other model approved by the Chief Executive of the Waikato Regional Council).</p> <p>D. The Nitrogen Reference Point data shall comprise the electronic output file from the OVERSEER®, <u>APSIM or SPASMO</u>, or other approved model, and where the OVERSEER Model is used, it must be calculated using the OVERSEER Best Practice Data Input Standards 2016, with the exceptions and inclusions set out in Schedule B Table 1.</p> <p>...</p> <p>G. The following records (where relevant to the</p>	<p>would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p>land use undertaken on the property or enterprise) must be retained and provided <u>available for inspection by</u> to Waikato Regional Council at its request:</p> <p>i. Stock numbers as recorded in annual accounts together with stock sale and purchase invoices; ... vi. <u>The representative range of c</u>Grops grown on the land; and vii. Horticulture crop diaries and NZGAP records."]</p>	
		PC1-12435	<p>Schedule 1 Support the provision with amendments</p> <p>AMEND Schedule 1 to split commercial vegetable cropping farm plans into a new Schedule 1B AND DELETE the vegetable growing minimum standards from Schedule 1 AND ADD a NEW Schedule 1B to read as follows: "<u>Schedule 1B - Requirements for Farm Environment Plans for commercial vegetable production enterprises</u> 1. <u>A Farm Environment Plan shall be prepared in accordance with the requirements of A below. The Farm Environment Plan shall be certified as meeting the requirements of A by a Certified Farm Environment Planner (commercial vegetable production).</u> 2. <u>The construction of a farm plan does not require duplication of material within existing farm environment plans that are considered sufficient for purpose by a Certified Farm Environment Planner (commercial vegetable production).</u> 3. <u>Farm plans are not required to duplicate material provided to Waikato Regional Council for</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>the purpose of complying with other rules in the plan.</u></p> <p><u>4. Farm Plans will not be incorporated into consent conditions as a whole; but matters of control or discretion will include relevant actions committed to by the consent holder.</u></p> <p><u>5. The Farm Environment Plan shall identify key risk areas for the discharge of sediment, nitrogen, phosphorus and microbial pathogens, and identify actions, and timeframes for those actions to be completed, in order to reduce the diffuse discharges of these contaminants where practicable.</u></p> <p><u>The Farm Environment Plan must clearly identify how any specified consent condition will be complied with. A Farm Environment Plans shall contain as a minimum:</u></p> <p><u>1. The name of the legal entity registered with the Waikato Regional Council.</u></p> <p><u>2. Information provided by the Council from registration between 1 Sep 2018 and 31 March 2019.</u></p> <p><u>3. A description of the enterprise, detailing the general rotational cropping system. properties owned, leased and otherwise farmed on over time. This will include the legal description for each parcel of land.</u></p> <p><u>4. An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the farming activities on the property, and the priority of those identified risks, having regard to sub-catchment targets in Table 3.11-1 and the priority of lakes within the sub-catchment. As a minimum, the risk assessment shall include:</u></p> <p><u>a. A risk assessment for nutrient discharges that is approved by a Certified Farm Environment</u></p>	
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			<p><u>Planner (commercial vegetable crops). The risk assessment should be equivalent to the process outlined in Section 4 of the Horticulture New Zealand Code of Practice for Nutrient Management Version 1.0 August 2014.</u></p> <p><u>b. A risk assessment for soil conservation purposes, that is approved by a Certified Farm Environment Planner (commercial vegetable crops). The risk assessment should be equivalent to the process outlined in Section 1 of the Horticulture New Zealand Erosion & Sediment Control Guidelines for Vegetable Production Version 1.1 June 2014.</u></p> <p><u>c. If manures are used, undertake a microbiological discharge risk assessment.</u></p> <p><u>5. If stock are present on land managed within the enterprise, provisions of Schedule 1 relating to the farming of animals apply. If stock are present a risk assessment for stock related discharges must be undertaken .</u></p> <p><u>6. A schedule of mitigation actions and target completion dates derived from the risk assessments undertaken in 4 and 5 above.</u></p> <p><u>7. Vegetable Growing Minimum Standards Farm environment plans required under Rule 3.11.5.5, 3.11.5.6b, or 3.11.5.X shall, in addition to the matters set out above, ensure the following matters are addressed."</u></p> <p>AND INCLUDE the table for Vegetable Growing Minimum Standards as laid out in the submission.</p>	
		V1PC1-1646	<p>Schedule 1 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12435:</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points</p>

		<p>[AMEND Schedule 1 to split commercial vegetable cropping farm plans into a new Schedule 1B AND DELETE the vegetable growing minimum standards from Schedule 1 AND ADD a NEW Schedule 1B to read as follows: <u>"Schedule 1B - Requirements for Farm Environment Plans for commercial vegetable production enterprises</u> 1. <u>A Farm Environment Plan shall be prepared in accordance with the requirements of A below. The Farm Environment Plan shall be certified as meeting the requirements of A by a Certified Farm Environment Planner (commercial vegetable production).</u> 2. <u>The construction of a farm plan does not require duplication of material within existing farm environment plans that are considered sufficient for purpose by a Certified Farm Environment Planner (commercial vegetable production).</u> 3. <u>Farm plans are not required to duplicate material provided to Waikato Regional Council for the purpose of complying with other rules in the plan.</u> 4. <u>Farm Plans will not be incorporated into consent conditions as a whole; but matters of control or discretion will include relevant actions committed to by the consent holder.</u> 5. <u>The Farm Environment Plan shall identify key risk areas for the discharge of sediment, nitrogen, phosphorus and microbial pathogens, and identify actions, and timeframes for those actions to be completed, in order to reduce the diffuse discharges of these contaminants where practicable.</u> <u>The Farm Environment Plan must clearly identify</u></p>	<p>made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p><u>how any specified consent condition will be complied with. A Farm Environment Plans shall contain as a minimum:</u></p> <ol style="list-style-type: none"> <u>1. The name of the legal entity registered with the Waikato Regional Council.</u> <u>2. Information provided by the Council from registration between 1 Sep 2018 and 31 March 2019.</u> <u>3. A description of the enterprise, detailing the general rotational cropping system, properties owned, leased and otherwise farmed on over time. This will include the legal description for each parcel of land.</u> <u>4. An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the farming activities on the property, and the priority of those identified risks, having regard to sub-catchment targets in Table 3.11-1 and the priority of lakes within the sub-catchment. As a minimum, the risk assessment shall include:</u> <ol style="list-style-type: none"> <u>a. A risk assessment for nutrient discharges that is approved by a Certified Farm Environment Planner (commercial vegetable crops). The risk assessment should be equivalent to the process outlined in Section 4 of the Horticulture New Zealand Code of Practice for Nutrient Management Version 1.0 August 2014.</u> <u>b. A risk assessment for soil conservation purposes, that is approved by a Certified Farm Environment Planner (commercial vegetable crops). The risk assessment should be equivalent to the process outlined in Section 1 of the Horticulture New Zealand Erosion & Sediment Control Guidelines for Vegetable Production Version 1.1 June 2014.</u> <u>c. If manures are used, undertake a</u> 	
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			<p><u>microbiological discharge risk assessment.</u></p> <p><u>5. If stock are present on land managed within the enterprise, provisions of Schedule 1 relating to the farming of animals apply. If stock are present a risk assessment for stock related discharges must be undertaken .</u></p> <p><u>6. A schedule of mitigation actions and target completion dates derived from the risk assessments undertaken in 4 and 5 above.</u></p> <p><u>7. Vegetable Growing Minimum Standards Farm environment plans required under Rule 3.11.5.5, 3.11.5.6b, or 3.11.5.X shall, in addition to the matters set out above, ensure the following matters are addressed."</u></p> <p>AND INCLUDE the table for Vegetable Growing Minimum Standards as laid out in the submission.]</p>	
		PC1-12436	<p>Schedule 1 Support the provision with amendments</p> <p>AMEND Schedule 1 to read: "A Farm Environment Plan shall be prepared in accordance with the requirements of A below. The Farm Environment Plan shall be certified as meeting the requirements of A by a Certified Farm Environment Planner. The Farm Environment Plan shall identify all sources of sediment, nitrogen, phosphorus and microbial pathogens, and identify actions, and timeframes for those actions to be completed, in order to reduce the diffuse discharges of these contaminants.</p> <p>The Farm Environment Plan must clearly identify how specified minimum standards will be complied with.</p> <p>The requirements set out in A apply to all Farm</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>Environment Plans, including those prepared within a Certified Industry Scheme. <u>A separate schedule has been prepared for commercial vegetable cropping systems and plans prepared by catchment collectives.</u></p> <p>This Schedule 1 applies to all farming activities <u>other than commercial vegetable cropping systems</u>, but it is acknowledged that some provisions will not be relevant to every farming activity.</p> <p>...</p> <p>2. An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the farming activities on the property, and the priority of those identified risks, having regard to sub-catchment targets in Table 3.11-1 and the priority of lakes within the sub-catchment. As a minimum, the risk assessment shall include (where relevant to the particular land use):</p> <p>...(b) A description of setbacks and riparian management, including:</p> <p>... (iii). The provision of minimum cultivation setbacks of 5 metres <u>and/or any other practicable measures considered necessary in an erosion and sediment control plan.</u></p> <p>(c) A description of the critical source areas from which sediment, nitrogen, phosphorus and microbial pathogens are lost, including:</p> <p>(i) the identification of intermittent waterways, overland flow paths, cultivated land and areas prone to flooding and ponding, and an assessment of opportunities to minimise losses from these areas through appropriate stocking policy, stock exclusion and/or measures to detain floodwaters and settle out or otherwise remove sediment, nitrogen, phosphorus and microbial</p>	
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			<p>pathogens (e.g. detention bunds, sediment traps, natural and constructed wetlands); and</p> <p>...</p> <p>(iii) an assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens from cultivated land, tracks and races and livestock crossing structures to waterways, and the identification of appropriate measures to minimise these discharges (e.g. cut-off drains, and shaping); and</p> <p>...</p> <p>3. A spatial risk map(s) at a scale that clearly shows:</p> <p>(a) The boundaries of the property; and</p> <p>(b) The locations of the main relevant land uses activities that occur on the property;</p> <p>...</p> <p>5. A description of the following:</p> <p>(b) Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026, except in the case of Rule 3.11.5.5."</p>	
		V1PC1-1647	<p>Schedule 1 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12436 [AMEND Schedule 1 to read: "A Farm Environment Plan shall be prepared in accordance with the requirements of A below. The Farm Environment Plan shall be certified as meeting the requirements of A by a Certified Farm Environment Planner.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent</p>

			<p>The Farm Environment Plan shall identify all sources of sediment, nitrogen, phosphorus and microbial pathogens, and identify actions, and timeframes for those actions to be completed, in order to reduce the diffuse discharges of these contaminants.</p> <p>The Farm Environment Plan must clearly identify how specified minimum standards will be complied with.</p> <p>The requirements set out in A apply to all Farm Environment Plans, including those prepared within a Certified Industry Scheme. <u>A separate schedule has been prepared for commercial vegetable cropping systems and plans prepared by catchment collectives.</u></p> <p>This Schedule 1 applies to all farming activities <u>other than commercial vegetable cropping systems</u>, but it is acknowledged that some provisions will not be relevant to every farming activity.</p> <p>...</p> <p>2. An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the farming activities on the property, and the priority of those identified risks, having regard to sub-catchment targets in Table 3.11-1 and the priority of lakes within the sub-catchment. As a minimum, the risk assessment shall include (where relevant to the particular land use):</p> <p>...(b) A description of setbacks and riparian management, including:</p> <p>... (iii). The provision of minimum cultivation setbacks of 5 metres <u>and/or any other practicable measures considered necessary in an erosion and sediment control plan.</u></p> <p>(c) A description of the critical source areas from</p>	<p>with the specific decisions sought by WPL in its own submissions.</p>
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			<p>which sediment, nitrogen, phosphorus and microbial pathogens are lost, including:</p> <p>(i) the identification of intermittent waterways, overland flow paths, cultivated land and areas prone to flooding and ponding, and an assessment of opportunities to minimise losses from these areas through appropriate stocking policy, stock exclusion and/or measures to detain floodwaters and settle out or otherwise remove sediment, nitrogen, phosphorus and microbial pathogens (e.g. detention bunds, sediment traps, natural and constructed wetlands); and</p> <p>...</p> <p>(iii) an assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens from <u>cultivated land</u>, tracks and races and livestock crossing structures to waterways, and the identification of appropriate measures to minimise these discharges (e.g. cut-off drains, and shaping); and</p> <p>...</p> <p>3. A spatial risk map(s) at a scale that clearly shows:</p> <p>(a) The boundaries of the property; and</p> <p>(b) The locations of the main relevant land uses activities that occur on the property;</p> <p>...</p> <p>5. A description of the following:</p> <p>(b) Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026, <u>except in the case of Rule 3.11.5.5.</u>"]</p>	
		PC1-10215	Schedule 1	WPL supports and

			<p>Support the provision with amendments</p> <p>ADD a NEW Schedule 1C to provide for sub-catchment scale solutions</p> <p>AND ADD a NEW Schedule 1C to read as follows: <u>"Schedule 1C - Requirements for a sub-catchment scale management plan applying to Rule 3.11.5.X iv - Restricted Discretionary Activity Rule - The management of contaminants from farming activities by a catchment collective. A sub-catchment scale management plan (SSMP) shall be prepared in accordance with the requirements below.</u></p> <p><u>1) The (SSMP) must be approved by the Regional Council Chief Executive before an application under Rule 3.11.5.X can be granted by the Council.</u></p> <p><u>2) The SSMP must meet or exceed the expected reduction in discharges to freshwater that would be achieved through completing and implementing a farm or enterprise scale farm environment plan in accordance with Schedule 1 and Schedule 1b. The achievement in reduction of discharges must be comparable when considered over all of the properties and enterprises managed by the SSMP.</u></p> <p><u>3) The SSMP must be the responsibility of a legal entity that is accountable for achieving compliance with the conditions of a resource consent issued under Rule 3.11.5.X.</u></p> <p><u>4) The SSMP must be supported by a decision support tool that is able to be utilised as the accounting framework for the relevant sub-catchment. The decision support tool must:</u></p> <p><u>a) Calibrate discharges and hydrological flows to observed monitoring sites within the catchment. The calibration must achieve at least achieve a</u></p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p><u>'Satisfactory' criteria for a daily model with NSE - 0.6, % bias- +/- 25%</u> <u>and the decision support tool must be capable of continuous upgrade and improvement.</u> <u>b) Be capable of integrating with other sub-catchment, freshwater management unit and catchment scale accounting systems.</u> <u>c) Be able to measure mitigations for microbial, sediment, nitrogen and phosphorus discharges at all scales within the domain of the decision support tool to a standard approved by peer review agent approved by the Chief Executive of the Regional Council.</u> <u>d) Be made available to the Council for use in assessing compliance with the load limit targets for the relevant sub- catchment listed in Schedule 1C Table XX.</u> <u>5) The SSMP must clearly identify how any specified consent condition will be complied with.</u> <u>6) The SSMP shall contain as a minimum:</u> <u>a) The name of the legal entity registered with the Waikato Regional Council. Information provided by the Council from registration between 1 Sep 2018 and 31 March 2019.</u> <u>b) A legal description of all properties and enterprises the legal entity described in Schedule 1C 3) above have legal authority to act on behalf of.</u> <u>c) A description of the nature of enterprises, farms and properties and the domain of the SSMP.</u> <u>d) An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the activities within the SSMP domain, and the priority of those identified risks, having regard to sub-catchment load targets in Schedule 1C Table XX below.</u></p>	
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			<p><u>e) A schedule of approved mitigation actions and target completion dates.</u> AND ADD Schedule 1C Table XX referred to in the submission.</p>	
		V1PC1-1641	<p>Schedule 1 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10215: [ADD a NEW Schedule 1C to provide for sub-catchment scale solutions AND ADD a NEW Schedule 1C to read as follows: <u>"Schedule 1C - Requirements for a sub-catchment scale management plan applying to Rule 3.11.5.X iv - Restricted Discretionary Activity Rule - The management of contaminants from farming activities by a catchment collective. A sub-catchment scale management plan (SSMP) shall be prepared in accordance with the requirements below.</u> <u>1) The (SSMP) must be approved by the Regional Council Chief Executive before an application under Rule 3.11.5.X can be granted by the Council.</u> <u>2) The SSMP must meet or exceed the expected reduction in discharges to freshwater that would be achieved through completing and implementing a farm or enterprise scale farm environment plan in accordance with Schedule 1 and Schedule 1b. The achievement in reduction of discharges must be comparable when considered over all of the properties and enterprises managed by the SSMP.</u> <u>3) The SSMP must be the responsibility of a legal entity that is accountable for achieving compliance with the conditions of a resource</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>consent issued under Rule 3.11.5.X.</u></p> <p><u>4) The SSMP must be supported by a decision support tool that is able to be utilised as the accounting framework for the relevant sub-catchment. The decision support tool must:</u></p> <p><u>a) Calibrate discharges and hydrological flows to observed monitoring sites within the catchment. The calibration must achieve at least achieve a 'Satisfactory' criteria for a daily model with NSE - 0.6, % bias- +/- 25% and the decision support tool must be capable of continuous upgrade and improvement.</u></p> <p><u>b) Be capable of integrating with other sub-catchment, freshwater management unit and catchment scale accounting systems.</u></p> <p><u>c) Be able to measure mitigations for microbial, sediment, nitrogen and phosphorus discharges at all scales within the domain of the decision support tool to a standard approved by peer review agent approved by the Chief Executive of the Regional Council.</u></p> <p><u>d) Be made available to the Council for use in assessing compliance with the load limit targets for the relevant sub- catchment listed in Schedule 1C Table XX.</u></p> <p><u>5) The SSMP must clearly identify how any specified consent condition will be complied with.</u></p> <p><u>6) The SSMP shall contain as a minimum:</u></p> <p><u>a) The name of the legal entity registered with the Waikato Regional Council. Information provided by the Council from registration between 1 Sep 2018 and 31 March 2019.</u></p> <p><u>b) A legal description of all properties and enterprises the legal entity described in Schedule 1C 3) above have legal authority to act on behalf of.</u></p> <p><u>c) A description of the nature of enterprises.</u></p>	
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			<p><u>farms and properties and the domain of the SSMP.</u></p> <p>d) <u>An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the activities within the SSMP domain, and the priority of those identified risks, having regard to sub-catchment load targets in Schedule 1C Table XX below.</u></p> <p>e) <u>A schedule of approved mitigation actions and target completion dates.</u>"</p> <p>AND ADD Schedule 1C Table XX referred to in the submission.]</p>	
		PC1-10227	<p>Glossary of Terms Support the provision with amendments</p> <p>ADD a NEW definition for Catchment Collective to read: "<u>Definition - Catchment collective</u> <u>Catchment collective: means a group of enterprises or properties in multiple ownership, where the owners of those enterprises or properties undertake farming activities and operate as a collective for the purposes of contaminant management.</u>"</p> <p><u>AND ADD a NEW definition for Certified Farm Environment Planner (Commercial Vegetable Production) to read: "Certified Farm Environment Planner (Commercial Vegetable Production) (Commercial Vegetable Production): is a person or entity certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a Certified Farm Environment Planner (Commercial Vegetable Production) and has as a minimum the following qualifications and experience:</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>a. Tertiary qualifications in agronomy or agricultural engineering</u></p> <p><u>b. More than 15 years' experience working with commercial vegetable cropping systems</u></p> <p><u>c. A certificate of competence approved by the Waikato Regional Council relating to the relevant aspects of environmental farm plan assessment"</u></p> <p><u>AND ADD new definition for Sub-catchment Scale Management Plans to read:</u></p> <p><u>"Sub-catchment Scale Management Plan (SSMP) Sub-catchment Scale Management Plan (SSMP): means a sub-catchment scale plan for that sets out actions and responsibilities for a Catchment Collective (representing all or part of a sub-catchment) for the purposes of contaminant management that meets or exceeds the expected reduction in discharge to freshwater that would otherwise be achieved through a Farm Environment Plan."</u></p>	
		V1PC1-1642	<p>Glossary of Terms Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10227: [ADD a NEW definition for Catchment Collective to read: "<u>Definition - Catchment collective</u> <u>Catchment collective: means a group of enterprises or properties in multiple ownership, where the owners of those enterprises or properties undertake farming activities and operate as a collective for the purposes of contaminant management."</u></p> <p><u>AND ADD a NEW definition for Certified Farm Environment Planner (Commercial Vegetable Production) to read: "Certified Farm Environment</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>Planner (Commercial Vegetable Production) Certified Farm Environment Planner (Commercial Vegetable Production): is a person or entity certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a Certified Farm Environment Planner (Commercial Vegetable Production) and has as a minimum the following qualifications and experience:</u></p> <p><u>a. Tertiary qualifications in agronomy or agricultural engineering</u></p> <p><u>b. More than 15 years' experience working with commercial vegetable cropping systems</u></p> <p><u>c. A certificate of competence approved by the Waikato Regional Council relating to the relevant aspects of environmental farm plan assessment"</u></p> <p><u>AND ADD new definition for Sub-catchment Scale Management Plans to read:</u></p> <p><u>"Sub-catchment Scale Management Plan (SSMP) Sub-catchment Scale Management Plan (SSMP): means a sub-catchment scale plan for that sets out actions and responsibilities for a Catchment Collective (representing all or part of a sub-catchment) for the purposes of contaminant management that meets or exceeds the expected reduction in discharge to freshwater that would otherwise be achieved through a Farm Environment Plan."</u>]</p>	
		PC1-10235	<p>Certified Farm Nutrient Advisor definition</p> <p>Oppose the provision with amendments</p> <p>AMEND the definition of Certified Farm Nutrient Advisor to read:</p> <p>"Certified Farm Nutrient Advisor: is a person certified by the Chief Executive Officer of Waikato Regional Council and listed on the</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the</p>

			<p>Waikato Regional Council website as a certified farm nutrient advisor and has the following <u>competencies qualifications and experience</u>:</p> <p>a. Has completed nutrient management training to at least intermediate level, <u>sufficient agronomic knowledge to conduct the assessment of a budget for the farm or enterprise,</u> and</p> <p>b. Has experience in nutrient management planning the appropriate level of experience in the modelling tool utilised to develop the nutrient budget."</p>	<p>submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1604	<p>Certified Farm Nutrient Advisor definition Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10235: [AMEND the definition of Certified Farm Nutrient Advisor to read: "Certified Farm Nutrient Advisor: is a person certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a certified farm nutrient advisor and has the following <u>competencies qualifications and experience</u>:</p> <p>a. Has completed nutrient management training to at least intermediate level, <u>sufficient agronomic knowledge to conduct the assessment of a budget for the farm or enterprise,</u> and</p> <p>b. Has experience in nutrient management planning the appropriate level of experience in the modelling tool utilised to develop the nutrient budget."]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10232	<p>Enterprise definition Support the provision with amendments</p>	<p>WPL opposes the submission because it is not consistent with</p>

			AMEND the definition of Enterprise/s to read: "Enterprise/s: means one or more parcels of land (or parts of parcels of land) held in single or multiple ownership to <u>support the primary production activities undertaken</u> principle land use or land which the principle land use is reliant upon , and constitutes a single operating unit for the purposes of management. An enterprise is considered to be within a sub-catchment if more than 50% of that enterprise is within the sub-catchment."	the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1644	Enterprise definition Support with amendments APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10232: [AMEND the definition of Enterprise/s to read: "Enterprise/s: means one or more parcels of land (or parts of parcels of land) held in single or multiple ownership to <u>support the primary production activities undertaken</u> principle land use or land which the principle land use is reliant upon , and constitutes a single operating unit for the purposes of management. An enterprise is considered to be within a sub-catchment if more than 50% of that enterprise is within the sub-catchment."]	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10234	Nitrogen Reference Point definition Support the provision with amendments RETAIN the definition of Nitrogen Reference Point that provides for the establishment of an alternative method or model to establish a benchmark nitrogen and phosphorus discharge for commercial vegetable production systems.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the

				submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1645	<p>Nitrogen Reference Point definition Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10234: [RETAIN the definition of Nitrogen Reference Point that provides for the establishment of an alternative method or model to establish a benchmark nitrogen and phosphorus discharge for commercial vegetable production systems.]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
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Matamata-Piako District Council	73419	PC1-3463	<p>Objective 3 Oppose the provision with amendments</p> <p>AMEND Objective 3 to read as follows: "<u>Changes to water management and land use are implemented by 2026 that achieve 10% of the required change between current water quality and the 80-year water quality attribute targets in</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the

			<u>Table 3.11.1 whilst recognising the 'lag' period for nutrient flows already in the system."</u>	submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-3468	Objective 4 Oppose the provision with amendments AMEND Objective 4 to read as follows: " <u>A staged approach to land use change is managed to minimise the impacts of transition on the social, economic and cultural well-being of communities in the short term.</u> " AND AMEND the Reasons accordingly.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-3482	Policy 1 Support the provision with amendments AMEND Policy 1 to incorporate an agreed, measurable and enforceable baseline for each of the four diffuse discharges from which these general terms can then be measured or benchmarked.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by

				WPL in its own submissions.
		PC1-3489	<p>Policy 4 Support the provision with amendments</p> <p>AMEND Policy 4 as per the relief set out under Policy 1 to provide for agreed, measurable and enforceable base lines for each of the four diffuse discharges that are required to be monitored on a case by case basis. Alternatively, delete reference to Objective 3. AND AMEND to read: "Policy 4: <u>Enable activities with discharges of low volumes and concentrations of contaminants to continue or to establish while signalling further contaminant reductions may be required.</u>"</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-3494	<p>Policy 6 Oppose the provision with amendments</p> <p>DELETE the first sentence of Policy 6 and re-draft the remaining sentence to improve clarity and interpretation.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-3497	<p>Policy 7 Oppose the provision with amendments</p> <p>DELETE first paragraph of Policy 7 AND AMEND the sentence commencing 'Any future allocation should consider...' to incorporate the footnote. AND RETAIN clause 'c' that reads: 'Minimise social disruption and costs in the transition to the 'land suitability' approach'</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be

			AND AMEND to reflect the matters taken into account in Policy 16 i-iii.	allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-3700	<p>Rule 3.11.5.2 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.2 after: working with sector groups to determine a realistic threshold to apply as a performance standard as a permitted activity and confirming that the approach meets the section 32 efficiency and effectiveness tests (including with respect to separation distances, restriction on winter forage crops, and reporting requirements).</p> <p>AND AMEND to clarify how '6 stock units per hectare' was arrived at.</p> <p>AND AMEND to clarify the meaning and application of 'is used for arable cropping'</p> <p>AND AMEND Rule 3.11.5.2(3)(a) to read as follows: "The farming activities do not form part of an enterprise being undertaken on more than one property <u>within the Waikato River and Waipa River catchments.</u>"</p> <p>AND CONSIDER the appropriateness of the 22 October 2016 date</p> <p>AND AMEND to clarify how the Nitrogen Reference Point is to be used (ie as a standard or a guideline) in Point 4a AND AMEND to clarify what 4x 'No part of the property or enterprise over 15 degrees slope is cultivated or grazed' means for compliance and enforcement.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-3701	Rule 3.11.5.4	WPL supports and

			<p>Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.4 so that it provides a fair allocation approach and work with landowners, sector groups and communities to provide alternative practicable measures to achieve the same environmental outcomes.</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-3702	<p>Rule 3.11.5.5</p> <p>Oppose the provision with amendments</p> <p>With respect to Rule 3.11.5.5, work with the sector groups to review the reasons for the adoption of this set of reporting performance conditions and standards as a controlled activity. OR AMEND to ensure that the current approach meets the section 32 efficiency and effectiveness tests.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-3703	<p>Rule 3.11.5.7</p> <p>Oppose the provision</p> <p>CONSIDER a review with respect to Rule 3.11.5.7, the reasons for the adoption of this approach and the justification under section 32</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks</p>

			<p>regarding the efficiency and effectiveness of this method and rule AND AMEND to provide for the Land Use Change Rule to be at least (meaning no more restrictive than) Discretionary Activity AND ENSURE collaboration with landowners, sector groups and communities to provide alternative practicable measures to achieve the same environmental outcomes.</p>	<p>that it should be disallowed.</p>
		PC1-3678	<p>Schedule B Support the provision with amendments</p> <p>AMEND Schedule B to provide an effects based approach to contaminant management including nitrogen leaching AND AMEND to provide an effects based approach to address the other targeted contaminants - phosphorous, sediment and microbial pathogens AND AMEND to read as follows: "A property or enterprise with a cumulative area greater than 20 10 hectares {or any property or enterprise used for commercial vegetable production} must have a Nitrogen Reference Point calculated as follows..." AND AMEND to provide evidence that the section 32 evaluation confirms Schedule B a. is the preferred approach to adopt and there are appropriately qualified and experienced professionals able to provide this information AND AMEND to provide evidence that the section 32 evaluation confirms that OVERSEER is the preferred method and rule for monitoring and setting consent conditions for nitrogen leaching for all primary production activities.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

		PC1-3689	<p>Schedule 1 Oppose the provision with amendments</p> <p>AMEND to provide evidence with respect to Schedule 1, that the section 32 evaluation confirms this is the preferred approach to adopt regarding the efficiency and effectiveness of this method and rule AND ENSURE collaboration with landowners, sector groups and communities to provide alternative practicable measures to achieve the same environmental outcomes AND AMEND to review the extent, complexity and information requirements for Farm Environment Plans to reduce potential consultancy, compliance and audit costs to the landowner and regulator AND AMEND to simplify the extent, complexity and information requirements AND AMEND to justify the current approach in terms of the effectiveness and efficiency tests under section 32.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
Mercury NZ Ltd	73182	PC1-9504	<p>Objective 1 Support the provision</p> <p>RETAIN Objective 1.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		V1PC1-1053	<p>Objective 1 Support</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9504:</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own</p>

			[RETAIN Objective 1.]	submissions, and seeks that it should be disallowed.
		PC1-9511	Objective 3 Support the provision RETAIN Objective 3.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1077	Objective 3 Support APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9511: [RETAIN Objective 3.]	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-9514	Objective 4 Support the provision RETAIN Objective 4 particularly the reference to values and uses in Objective 4 (a).	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1060	Objective 4 Support APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9514: [RETAIN Objective 4 particularly the reference to	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks

			values and uses in Objective 4 (a).]	that it should be disallowed.
		PC1-9516	Policy 1 Support the provision RETAIN Policy 1.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1102	Policy 1 Support APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9516: [RETAIN Policy 1.]	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-9538	Policy 6 Support the provision RETAIN Policy 6.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1061	Policy 6 Support APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9538: [RETAIN Policy 6.]	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be

				disallowed.
		PC1-9540	Policy 7 Support the provision RETAIN Policy 7.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1052	Policy 7 Support APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9540: [RETAIN Policy 7.]	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-9592	Method 3.11.4.7 Support the provision with amendments AMEND Method 3.11.4.7 to read: "3.11.4.7 Information needs to support any future allocation... <u>Waikato Regional Council will</u> gather information and commission appropriate scientific research to inform any future framework for the allocation of diffuse discharges including:..."	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1067	Method 3.11.4.7	WPL supports and

			<p>Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9592: [AMEND Method 3.11.4.7 to read: "3.11.4.7 Information needs to support any future allocation... <u>Waikato Regional Council will</u> gather information and commission appropriate scientific research to inform any future framework for the allocation of diffuse discharges including:..."]</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-9596	<p>Method 3.11.4.11 Support the provision with amendments</p> <p>AMEND Method 3.1.4.11 (a) and (e) to read: "a. Review and report on the progress towards and achievement of the 80- year water quality objectives of Chapter 3.11 <u>every 5 years</u>... e. Work with industry to collate information on the functioning and success of any Certified industry <u>Sector</u> Scheme."</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1068	<p>Method 3.11.4.11 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9596: [AMEND Method 3.1.4.11 (a) and (e) to read: "a.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its</p>

			Review and report on the progress towards and achievement of the 80- year water quality objectives of Chapter 3.11 <u>every 5 years...</u> e. Work with industry to collate information on the functioning and success of any Certified industry <u>Sector Scheme.</u> "]	own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-9598	Rules 3.11.5 Support the provision RETAIN Rules 3.11.5.1 to 3.11.5.7, and associated Schedules A, B and C, and Schedule 1 and 2.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1070	Rules 3.11.5 Support APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9598: [RETAIN Rules 3.11.5.1 to 3.11.5.7, and associated Schedules A, B and C, and Schedule 1 and 2.]	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-9599	Rule 3.11.5.3 Support the provision with amendments RETAIN Rule 3.11.5.3 AND AMEND Rule 3.11.5.3 to read: "3.11.5.3 Permitted Activity Rule - Farming activities with a Farm Environment Plan under a Certified Industry <u>Sector Scheme...</u> Rule 3.11.5.3 - Permitted Activity Rule - Farming	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be

			<p>activities with a Farm Environment Plan under a Certified Industry Sector Scheme Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2 the use of land for farming activities (excluding commercial vegetable production) where the land use is registered to a Certified Industry Sector Scheme.... is a permitted activity subject to the following conditions:...</p> <p>4. The Certified Industry Sector Scheme meets the criteria set out in Schedule 2 and has been approved by the Chief Executive Officer of Waikato Regional Council; and..."</p>	<p>allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1092	<p>Rule 3.11.5.3 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9599: [RETAIN Rule 3.11.5.3 AND AMEND Rule 3.11.5.3 to read: "3.11.5.3 Permitted Activity Rule - Farming activities with a Farm Environment Plan under a Certified Industry Sector Scheme... Rule 3.11.5.3 - Permitted Activity Rule - Farming activities with a Farm Environment Plan under a Certified Industry Sector Scheme Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2 the use of land for farming activities (excluding commercial vegetable production) where the land use is registered to a Certified Industry Sector Scheme.... is a permitted activity subject to the following conditions:...</p> <p>4. The Certified Industry Sector Scheme meets the criteria set out in Schedule 2 and has been approved by the Chief Executive Officer of Waikato Regional Council; and..."]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

		PC1-9600	<p>Rule 3.11.5.4 Support the provision with amendments</p> <p>RETAIN Rule 3.11.5.4 AND AMEND Rule 3.11.5.4 to read: "3.11.5.4 Controlled Activity Rule - Farming activities with a Farm Environment Plan not under a Certified <u>Industry Sector</u> Scheme... Rule 3.11.5.4 - Controlled Activity Rule - Farming activities with a Farm Environment Plan not under a Certified <u>Industry Sector</u> Scheme Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2 the use of land for farming activities (excluding commercial vegetable production) where that land use is not registered to a Certified <u>Industry Sector</u> Scheme...."</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1081	<p>Rule 3.11.5.4 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9600: [RETAIN Rule 3.11.5.4 AND AMEND Rule 3.11.5.4 to read: "3.11.5.4 Controlled Activity Rule - Farming activities with a Farm Environment Plan not under a Certified <u>Industry Sector</u> Scheme... Rule 3.11.5.4 - Controlled Activity Rule - Farming activities with a Farm Environment Plan not under a Certified <u>Industry Sector</u> Scheme Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2 the use of land for farming activities (excluding commercial vegetable production) where that land use is not registered to a Certified <u>Industry Sector</u> Scheme...."]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-9604	Rule 3.11.5.5	WPL supports and

			<p>Support the provision with amendments</p> <p>RETAIN Rule 3.11.5.5 AND AMEND Rule 3.11.5.5 (d) to read: "...d. The land use is registered to a Certified Industry <u>Sector</u> Scheme; and..."</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1083	<p>Rule 3.11.5.5 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9604: [RETAIN Rule 3.11.5.5 AND AMEND Rule 3.11.5.5 (d) to read: "...d. The land use is registered to a Certified Industry <u>Sector</u> Scheme; and..."]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-9665	<p>Schedule 1 Support the provision with amendments</p> <p>AMEND Schedule 1 4th paragraph, to read: "...The requirements set out in A apply to all Farm Environment Plans, including those</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its</p>

			prepared within a Certified <u>Industry Sector</u> Scheme..."	own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1088	<p>Schedule 1 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9665: [AMEND Schedule 1 4th paragraph, to read: "...The requirements set out in A apply to all Farm Environment Plans, including those prepared within a Certified <u>Industry Sector</u> Scheme..."]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-9679	<p>Table 3.11-1 Oppose the provision with amendments</p> <p>RETAIN text under the heading of Table 3.11-1 regarding the intention of water quality targets not to be used as receiving water compliance limits/standards. AND AMEND to establish in Table 3.11-1 additional water quality target sites (monitoring sites) with corresponding short term and long term numerical targets, i.e. one sub-catchment</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent

			<p>area applying to each water quality target site. AND AMEND Table 3.11-2 and Map 3.11-2 to redefine sub-catchment areas in order to differentiate tributaries from the main stem of the Waikato River, particularly for the Upper Waikato River FMU.</p> <p>AND AMEND the redefined sub-catchment Map 3.11-2, and Table 3.11-1, to include additional sub-catchment areas: corresponding to each hydro catchment, and any large tributaries entering the Waikato River within the Upper Waikato River FMU. [indicative map titled Additional Sub-Catchment Areas attached to the submission]</p> <p>AND AMEND to identify other tributary catchments as separate sub-catchments based on current land use and land cover.</p>	<p>with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1099	<p>Table 3.11-1 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9679: [RETAIN text under the heading of Table 3.11-1 regarding the intention of water quality targets not to be used as receiving water compliance limits/standards.</p> <p>AND AMEND to establish in Table 3.11-1 additional water quality target sites (monitoring sites) with corresponding short term and long term numerical targets, i.e. one sub-catchment area applying to each water quality target site. AND AMEND Table 3.11-2 and Map 3.11-2 to redefine sub-catchment areas in order to differentiate tributaries from the main stem of the Waikato River, particularly for the Upper Waikato River FMU.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>AND AMEND the redefined sub-catchment Map 3.11-2, and Table 3.11-1, to include additional sub-catchment areas: corresponding to each hydro catchment, and any large tributaries entering the Waikato River within the Upper Waikato River FMU. [indicative map titled Additional Sub-Catchment Areas attached to the submission]</p> <p>AND AMEND to identify other tributary catchments as separate sub-catchments based on current land use and land cover.]</p>	
		PC1-9680	<p>Table 3.11-2 Support the provision with amendments</p> <p>ADD to Table 3.11-2 an explanatory to confirm that Lakes Freshwater Management Units are included in sub-catchment areas.</p> <p>AND AMEND and redefine sub-catchment areas listed in Table 3.11-2 and mapped on Map 3.11-2 to differentiate tributaries from the main stem of the Waikato River, particularly for the Upper Waikato River FMU.</p>	<p>WPL supports the submission because it is generally consistent with the decisions sought by WPL, and seeks that it should be allowed.</p>
		V1PC1-1071	<p>Table 3.11-2 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9680: [ADD to Table 3.11-2 an explanatory to confirm that Lakes Freshwater Management Units are included in sub-catchment areas.</p> <p>AND AMEND and redefine sub-catchment areas listed in Table 3.11-2 and mapped on Map 3.11-2 to differentiate tributaries from the main stem of the Waikato River, particularly for the Upper Waikato River FMU.]</p>	<p>WPL supports the submission because it is generally consistent with the decisions sought by WPL, and seeks that it should be allowed.</p>

		PC1-9687	<p>Glossary of Terms Support the provision</p> <p>ADD a NEW definition of regionally significant industry to the Glossary of Terms to read: <u>"Regionally significant industry - For the purpose of Chapter 3.11, 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, including their associated point source discharges. These may include social, economic or cultural benefits. Regionally significant industry includes the following activities, but does not include primary production activities or Certified Sector Schemes:</u> <u>a. Dairy manufacturing sites</u> <u>b. Meat processing and rendering Plants</u> <u>c. Pulp and paper processing plants; and</u> <u>d. mineral extraction activities."</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1096	<p>Glossary of Terms Support</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9687 for Additions to Glossary of Terms: [ADD a NEW definition of regionally significant industry to the Glossary of Terms to read: <u>"Regionally significant industry - For the purpose of Chapter 3.11, 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, including their associated point source discharges. These may include social, economic</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>or cultural benefits. Regionally significant industry includes the following activities, but does not include primary production activities or Certified Sector Schemes:</u></p> <p><u>a. Dairy manufacturing sites</u> <u>b. Meat processing and rendering Plants</u> <u>c. Pulp and paper processing plants; and</u> <u>d. mineral extraction activities."]</u></p>	
Miraka Ltd	73492	PC1-8767	<p>Objective 1 Support the provision with amendments</p> <p>AMEND Objective 1 such that sub-catchments are Freshwater Management Units.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-8775	<p>Objective 3 Support the provision with amendments</p> <p>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.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific</p>

				decisions sought by WPL in its own submissions.
		PC1-8807	Objective 4 Support the provision RETAIN Objective 4.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-8810	Policy 1 Support the provision with amendments <u>AMEND Policy 1(b) to read: "Requiring all farming activities to apply best management practices to mitigate the discharge of contaminants to water bodies."</u>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-8816	Policy 4 Oppose the provision with amendments AMEND Policy 4 to enable activities with lower discharges to continue or to be established, but with the requirement that they include best management practices for the mitigation of contaminant discharges in Farm Environment	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the

			Plans and implement such mitigation practices.	submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-8820	Policy 6 Support the provision RETAIN Policy 6.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-8821	Policy 7 Support the provision with amendments AMEND Policy 7 wording to ensure that it is clear that the land suitability approach is not the starting point, but is one potential option subject to the Schedule 1 process once there is more detail for people to evaluate.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-8870	Method 3.11.4.7 Support the provision with amendments AMEND Method 3.11.4.7(b)i to read as follows:	WPL supports and opposes the submission because it is generally consistent

			<p>"The quantum of contaminants that can be discharged at a sub- catchment and or Freshwater Management Unit scale while meeting the Table 3.11-1 water quality attribute targets." AND AMEND Method 3.11.4.7(b)ii to read as follows : "Methods to categorise and define 'land suitability', <u>as one potential allocation framework</u>"</p> <p>AND ADD an Implementation Method 3.11.4.7(c) to read as follows: "<u>Disseminating the information and research results in such a way as to inform the public and facilitate Schedule 1 processes around future allocation frameworks.</u>"</p>	<p>with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-8882	<p>Method 3.11.4.8 Support the provision</p> <p>RETAIN Method 3.11.4.8.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-8888	<p>Method 3.11.4.11 Support the provision</p> <p>RETAIN Method 3.11.4.11.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-8890	<p>Rule 3.11.5.2 Support the provision</p> <p>RETAIN Rule 3.11.5.2.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own</p>

				submissions, and seeks that it should be disallowed.
		PC1-8891	<p>Rule 3.11.5.3 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.3(5)(a)-(c) with a single 1 July 2020 date for all Farm Environment Plans to be prepared and provided AND REMOVE from Rule 3.11.5.3(5)(a) reference to the 75th percentile nitrogen leaching value.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-8892	<p>Rule 3.11.5.4 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.4(1)-(3) with a single date for all properties and enterprises AND DELETE Matters of Control iv AND AMEND the Dates i-iii with a single 1 July 2020 date for all.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-8893	Rule 3.11.5.6	WPL opposes the

			Support the provision RETAIN Rule 3.11.5.6.	submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-8894	Rule 3.11.5.7 Support the provision RETAIN Rule 3.11.5.7.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-8896	Schedule B Support the provision RETAIN Schedule B AND CLARIFY the specific OVERSEER Model referred to in Schedule B(c) and (d) and its relationship to the timing in (e).	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-12465	Schedule 1 Support the provision with amendments ADD to Schedule 1 a new clause to the effect that Waikato Regional Council will provide Best Management Practice guidelines for actions or measures to mitigate contaminant discharge in relation to a range of land uses, stock policies, land types and other biophysical factors, and that such mitigating actions or measures are to be included in Farm Environment Plans and	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent

			implemented on all properties and enterprises across the region.	with the specific decisions sought by WPL in its own submissions.
		PC1-8898	Schedule 1 Oppose the provision with amendments DELETE Schedule 1(5)(b) AND ADD a new method where the Nitrogen Reference Point is considered relative to productivity.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-8900	Table 3.11.1 Support the provision with amendments AMEND Table 3.11-1 to provide attribute information at the sub-catchment scale.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-8904	Enterprise definition Support the provision RETAIN the definition of enterprise.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be

				disallowed.
		PC1-8905	<p>Nitrogen Reference Point definition Support the provision with amendments</p> <p>AMEND to clarify the definition of Nitrogen Reference Point by including the specific version of the OVERSEER Model.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
N				
New Zealand Forest Owners Association Inc	73524	PC1-9956	<p>Policy 4 Support the provision with amendments</p> <p>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.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-9957	<p>Policy 6 Oppose the provision</p>	WPL opposes the submission because it

			DELETE Policy 6 AND MAKE any consequential amendments.	is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-9958	Policy 7 Support the provision with amendments RETAIN Policy 7. 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.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-9959	Rule 3.11.5.3 Oppose the provision REPLACE Rule 3.11.5.3 with appropriate rules to address those activities that are contributing most to water quality degradation. AND any consequential amendments.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own

				submissions.
		PC1-9961	<p>Rule 3.11.5.4 Oppose the provision</p> <p>DELETE reference to Nitrogen Reference Points as a method for assessing compliance AND any consequential amendments.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-9962	<p>Rule 3.11.5.7 Oppose the provision</p> <p>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.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
Ngati Haua Tribal Trust	73025	PC1-1976	<p>Rule 3.11.5.1 Oppose the provision</p> <p>AMEND Rule 3.11.5.1 Stock Exclusion to address the implications of stock exclusion on steeper and more extensive hill country. AND AMEND by directly linking fencing of stream requirement to land use intensity including an assessment of the potential risk factors and fenced in order of priority. AND AMEND to consider alternative solutions on steep land such as water reticulation installation. AND AMEND to match land use capability rather than directly to slope. A CONSIDER undertaking an industry wide capability assessment to assess who will</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>complete the plans. AND AMEND to show land owners and the industry how these are to be constructed and how the gains are quantified. AND AMEND to provide clarity as to how the monitoring of these plans will be undertaken and who will pay for this.</p>	
		PC1-1969	<p>Rule 3.11.5.2 Oppose the provision</p> <p>AMEND the Nitrogen Reference Point in PPC1 to provide for the long term averaging of nitrogen losses. AND AMEND to include alternative tools such as the use of the natural capital approach. AND AMEND to utilise tools such as MENUs as part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by the OVERSEER Model. AND AMEND where Overseer is to be used as part of the creation of solutions, calculations must be used as a guide only and the focus to be on the trends that are used. AND AMEND to address the implications of stock exclusion on steeper and more extensive hill country. AND AMEND by directly linking fencing of stream requirement to land use intensity including an assessment of the potential risk factors and fenced in order of priority. AND AMEND to consider alternative solutions on steep land such as water reticulation installation. AND AMEND to match land use capability rather than directly to slope. AND CONSIDER an industry wide capability</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>assessment to assess who will complete the plans. AND AMEND to show land owners and the industry how these are to be constructed and how the gains are quantified. AND AMEND to provide clarity as to how the monitoring of these plans will be undertaken and who will pay for this.</p>	
		PC1-1970	<p>Rule 3.11.5.3 Oppose the provision</p> <p>AMEND to provide for the long term averaging of nitrogen losses. Rule 3.11.5.3 AND AMEND to include alternative tools such as the use of the natural capital approach. AND AMEND by utilising tools such as menus as part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by Overseer. AND AMEND where OVERSEER is to be used as part of the creation of solutions, calculations must be used as a guide only and the focus to be on the trends that are used.</p> <p>Stock Exclusion AMEND to address the implications of stock exclusion on steeper and more extensive hill country. AND AMEND by directly linking fencing of stream requirement to land use intensity including an assessment of the potential risk factors and fenced in order of priority. AND AMEND to consider alternative solutions on steep land such as water reticulation installation. AND AMEND to match land use capability rather than directly to slope.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>Farm Environment Plan Undertake an industry wide capability assessment to assess who will complete the plans. AMEND to show land owners and the industry how these are to be constructed and how the gains are quantified. AND AMEND to provide clarity as to how the monitoring of these plans will be undertaken and who will pay for this.</p>	
		PC1-1971	<p>Rule 3.11.5.4 Oppose the provision</p> <p>AMEND Rule 3.11.5.4 to provide for the long term averaging of nitrogen losses. AND AMEND to include alternative tools such as the use of the natural capital approach. AND AMEND by utilising tools such as MENUs as part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by the OVERSEER Model. AND AMEND where Overseer is to be used as part of the creation of solutions, calculations must be used as a guide only and the focus to be on the trends that are used. AND AMEND to address the implications of stock exclusion on steeper and more extensive hill country. AND AMEND by directly linking fencing of stream requirement to land use intensity including an assessment of the potential risk factors and fenced in order of priority. AND AMEND to consider alternative solutions on steep land such as water reticulation installation. AND AMEND to match land use capability rather than directly to slope.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>AND CONSIDER undertaking an industry wide capability assessment to assess who will complete the plans.</p> <p>AND AMEND to show land owners and the industry how these are to be constructed and how the gains are quantified. AND AMEND to provide clarity as to how the monitoring of these plans will be undertaken and who will pay for this.</p>	
		PC1-1972	<p>Rule 3.11.5.5 Oppose the provision</p> <p>AMEND Rule 3.11.5.5 to provide for the long term averaging of nitrogen losses AND AMEND to include alternative tools such as the use of the natural capital approach AND AMEND by utilising tools such as MENUs as part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by the OVERSEER Model AND AMEND where Overseer is to be used as part of the creation of solutions, calculations must be used as a guide only and the focus to be on the trends that are used AND CONSIDER undertaking an industry wide capability assessment to assess who will complete the Farm Environment Plans AND AMEND to show land owners and industry how Farm Environment Plans are to be constructed and how the gains are quantified AND CLARIFY how the monitoring of these plans will be undertaken and who will pay for this.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-13075	<p>Rule 3.11.5.6 Oppose the provision</p>	<p>WPL opposes the submission because it</p>

			<p>Rule 3.11.5.6 - CONSIDER undertaking an industry wide capability assessment to assess who will complete the plans AND AMEND to show land owners and the industry how these are to be constructed and how the gains are quantified AND AMEND to provide clarity as to how the monitoring of these plans will be undertaken and who will pay for this AND AMEND to provide a unified approach to timeframes and content of consents issued.</p>	<p>is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-1973	<p>Rule 3.11.5.6 Oppose the provision</p> <p>AMEND Rule 3.11.5.6 to provide for the long term averaging of nitrogen losses AND AMEND to include alternative tools such as the use of the natural capital approach AND AMEND by utilising tools such as MENUs as part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by the OVERSEER Model AND AMEND where Overseer is to be used as part of the creation of solutions, calculations must be used as a guide only and the focus to be on the trends that are used.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-1974	<p>Rule 3.11.5.7 Oppose the provision</p> <p>AMEND Rule 3.11.5.7 to provide for the long term averaging of nitrogen losses AND AMEND to include alternative tools such as the use of the natural capital approach AND AMEND by utilising tools such as MENUs as</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the</p>

			<p>part of the solution toolbox as there are a number of mitigation's that are relevant to losses from farms that are not accurately captured by the OVERSEER Model</p> <p>AND AMEND where Overseer is to be used as part of the creation of solutions, calculations must be used as a guide only and the focus to be on the trends that are used.</p> <p>AND AMEND to address the implications of stock exclusion on steeper and more extensive hill country</p> <p>AND AMEND by directly linking fencing of stream requirement to land use intensity including an assessment of the potential risk factors and fenced in order of priority</p> <p>AND AMEND to consider alternative solutions on steep land such as water reticulation installation</p> <p>AND AMEND to match land use capability rather than directly to slope</p> <p>AND CONSIDER undertaking an industry wide capability assessment to assess who will complete the Farm Environment Plans.</p> <p>AND AMEND to show land owners and the industry how Farm Environment Plans are to be constructed and how the gains are quantified</p> <p>AND CLARIFY how the monitoring of these plans will be undertaken and who will pay for this.</p>	<p>submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-1975	<p>Schedule B</p> <p>Oppose the provision</p> <p>AMEND Schedule B to provide for the long term averaging of nitrogen losses.</p> <p>AMEND to include alternative tools such as the use of the natural capital approach.</p> <p>AMEND by utilising tools such as MENUs as part of the solution toolbox as there are a number of</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be</p>

			mitigation's that are relevant to losses from farms that are not accurately captured by OVERSEER. AND AMEND where Overseer is to be used as part of the creation of solutions, calculations must be used as a guide only and the focus to be on the trends that are used.	allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
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Oji Fibre Solutions (NZ) Ltd	73725	PC1-6322	Objective 1 Oppose the provision with amendments AMEND Objective 1 to read: "By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in achievement of the restoration and protection of the 80 year water quality attribute targets <u>goals- in Table 3-11.1. By 2066 discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in achievement of 30 percent of the restoration and protection of the 80 year water quality attribute goals in Table 3- 11.1.</u> " AND AMEND Objective 1 to incorporate the concept of the three well-beings [social economic and cultural well-being].	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-449	Objective 1 Support RETAIN the new text if the principal reasons for adopting the objectives are retained - Objective 1.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1113	Objective 1	WPL supports and

			<p>Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-6322: [AMEND Objective 1 to read: "By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in achievement of the restoration and protection of the 80 year water quality attribute targets <u>goals- in Table 3-11.1. By 2066 discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in achievement of 30 percent of the restoration and protection of the 80 year water quality attribute goals in Table 3- 11.1.</u>"</p> <p>AND AMEND Objective 1 to incorporate the concept of the three well-beings [social economic and cultural well-being.]</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-6370	<p>Objective 3 Oppose the provision with amendments</p> <p>AMEND Objective 3 to be consistent with the alternative approach 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] [overview of the alternative approach in Table 2 of submission] AND OR AMEND to read: "Actions put in place immediately and implemented by 2026 to reduce <u>non-point source</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens, are sufficient to achieve <u>Objective 1</u>. [as redrafted] ten percent of the required change between current water quality and the 80 year water quality towards the long term water quality improvements is indicated by the short</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			term water quality attribute^ targets^ in Table 3.11-1."	
		V1PC1-1174	<p>Objective 3 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-6370: [AMEND Objective 3 to be consistent with the alternative approach 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] [overview of the alternative approach in Table 2 of submission] AND OR AMEND to read: "Actions put in place immediately and implemented by 2026 to reduce <u>non-point source</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens, are sufficient to achieve <u>Objective 1</u>. [as redrafted] ten percent of the required change between current water quality and the 80 year water quality towards the long term water quality improvements is indicated by the short term water quality attribute^ targets^ in Table 3.11-1."]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-6389	<p>Objective 4 Oppose the provision with amendments</p> <p>AMEND Objective 4 to read: "...a. considering the values and uses when taking actions to achieve the attribute short term goals targets for the Waikato and Waipā Rivers in Table 3-11.1; and b. recognising that further contaminant reductions will be required <u>during the life of the plan and by subsequent regional plans and</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent

			<p>signalling anticipated future management approaches that will be needed to meet Objective 1."</p> <p>OR AMEND to ensure that Objective 4 is consistent with the alternative approach 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 [An overview of the alternative approach can be found in Table 2 of submission].</p>	<p>with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1175	<p>Objective 4 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-6389: [AMEND Objective 4 to read: "...a. considering the values and uses when taking actions to achieve the attribute short term goals targets for the Waikato and Waipā Rivers in Table 3-11.1; and b. recognising that further contaminant reductions will be required <u>during the life of the plan and by subsequent regional plans and</u> signalling anticipated future management approaches that will be needed to meet Objective 1."</p> <p>OR AMEND to ensure that Objective 4 is consistent with the alternative approach 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 [An overview of the alternative approach can be found in Table 2 of submission].]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-6395	<p>Policy 1 Support the provision with amendments</p>	<p>WPL supports and opposes the</p>

			<p>AMEND Policy 1 to read: "Manage and require <u>Achieve</u> reductions in sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from farming activities, by: a. Enabling activities with a low level of contaminant discharge to water bodies provided those discharges do not increase; <u>Requiring farming activities with a low level of contaminant discharge to water bodies to progressively exclude livestock (not including sheep) from rivers, streams, drains, wetlands and lakes</u> and b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to adopt the <u>Best Practicable Options</u> to reduce <u>or mitigate</u> their discharges; and c. Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes."</p> <p>OR AMEND to redraft the policy to reflect 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 [overview of the alternative approach in Table 2 of submission].</p>	<p>submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1182	<p>Policy 1 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-6395: [AMEND Policy 1 to read: "Manage and require <u>Achieve</u> reductions in sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from farming activities, by: a. Enabling activities with a low level of</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this</p>

			<p>contaminant discharge to water bodies provided those discharges do not increase; <u>Requiring farming activities with a low level of contaminant discharge to water bodies to progressively exclude livestock (not including sheep) from rivers, streams, drains, wetlands and lakes</u> and b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to adopt the <u>Best Practicable Options to reduce or mitigate</u> their discharges; and c. Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes."</p> <p>OR AMEND to redraft the policy to reflect 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 [overview of the alternative approach in Table 2 of submission].]</p>	would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-6401	<p>Policy 4 Support the provision with amendments</p> <p>AMEND Policy 4 to give effect to the reasons for the submission and so that it is consistent with 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] [An overview of the alternative approach can be found in Table 2 of the submission]. AND AMEND the policy to enable low leaching activities and new low leaching activities such as forestry, while ensuring that existing farming activities adopt some Best Practicable Options, such as fencing stock from waterways. AND AMEND the heading to include the word</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			'diffuse' consistent with the policy wording/ focus.	
		V1PC1-1172	<p>Policy 4 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-6401: [AMEND Policy 4 to give effect to the reasons for the submission and so that it is consistent with 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] [An overview of the alternative approach can be found in Table 2 of the submission]. AND AMEND the policy to enable low leaching activities and new low leaching activities such as forestry, while ensuring that existing farming activities adopt some Best Practicable Options, such as fencing stock from waterways. AND AMEND the heading to include the word 'diffuse' consistent with the policy wording/ focus.]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-6404	<p>Policy 6 Oppose the provision</p> <p>DELETE Policy 6. AND AMEND Policy 2 to incorporate a requirement for new farming activities to adopt Best Practicable Options from the outset.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1118	<p>Policy 6 Oppose</p>	WPL opposes the submission because it is not consistent with

			<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-6404: [DELETE Policy 6.</p> <p>AND AMEND Policy 2 to incorporate a requirement for new farming activities to adopt Best Practicable Options from the outset.]</p>	<p>the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-6423	<p>Policy 7 Support the provision with amendments</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>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1170	<p>Policy 7 Support the provision with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-6423: [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</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own</p>

			and further research.]	submissions.
		PC1-6941	<p>Method 3.11.4.7 Oppose the provision</p> <p>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 of diffuse discharges:...</u>" AND AMEND to make other changes appropriate to reflect the reasons for the submission and/ or the alternative approach proposed in the submission.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1164	<p>Method 3.11.4.7 Oppose</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission 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 of diffuse discharges:...</u>" AND AMEND to make other changes appropriate to reflect the reasons for the submission and/ or the alternative approach proposed in the submission.]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-7698	<p>Method 3.11.4.8 Oppose the provision</p>	WPL opposes the submission because it is not consistent with

			DELETE Method 3.11.4.8.	the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1133	Method 3.11.4.8 Oppose APPLY decision requested in accordance with the submitter's PPC1 submission PC1-7698: [DELETE Method 3.11.4.8.]	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-7701	Method 3.11.4.11 Oppose the provision with amendments AMEND Method 3.11.4.11 as reflect the reasons for the submission and/or the alternative approach proposed in the submission. AND AMEND Clause (e) to read: "...e) Work with industry <u>a broad range of stakeholders</u> to collate information on the functioning and success of any Certified Industry Scheme."	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1165	Method 3.11.4.11 Oppose APPLY decision requested in accordance with the submitter's PPC1 submission PC1-7701: [AMEND Method 3.11.4.11 as reflect the reasons	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its

			for the submission and/or the alternative approach proposed in the submission. AND AMEND Clause (e) to read: "...e) Work with industry <u>a broad range of stakeholders</u> to collate information on the functioning and success of any Certified Industry Scheme."]	own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-8083	Rule 3.11.5.2 Oppose the provision with amendments 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].	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1138	Rule 3.11.5.2 Oppose APPLY decision requested in accordance with the submitter's PPC1 submission 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].]	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-8084	Rule 3.11.5.3 Oppose the provision with amendments 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	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the

			<p>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 subject to the following conditions:</p> <ol style="list-style-type: none"> 1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and 2. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B; and 3. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and 4. The Certified Industry Scheme has a resource consent granted under Rule 3.11.5.8 [new RMA rule proposed in the submission] meets the criteria set out in Schedule 2 and has been approved by the Chief Executive Officer of Waikato Regional Council; and 5. A Farm Environment Plan which has been prepared in accordance with Schedule 1 and has been approved by a Certified Farm Environment Planner, is provided to the Waikato Regional Council as follows: <ol style="list-style-type: none"> a. By 1 July 2020 for properties or enterprises within Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value; b. By 1 July 2013 for properties or enterprises within Priority 2 sub-catchments listed in 3.11-2; c. By 1 July 2026 for properties or enterprises within Priority 3 sub-catchments listed in Table 3.11-2; and 	<p>submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p>6. The use of land shall be undertaken in accordance with the actions and timeframes specified in the Farm Environment Plan; and</p> <p>7. The Farm Environment Plan provided under Condition 5 may be amended in accordance with the procedure set out in Schedule 1 and the use of land shall thereafter be undertaken in accordance with the amended plan; and</p> <p>8. A copy of the Farm Environment Plan amended in accordance with Condition (7) shall be provided to the Waikato Regional Council within 30 working days."</p>	
		V1PC1-1137	<p>Rule 3.11.5.3 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission 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 <u>provided that</u> subject to the following conditions:</p> <ol style="list-style-type: none"> 1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and 2. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B ; and 3. Cattle, horses, deer and pigs are excluded 	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>from water bodies in conformance with Schedule C; and</p> <p>4. The Certified Industry Scheme has a resource consent granted under Rule 3.11.5.8 [new RMA rule proposed in the submission] meets the criteria set out in Schedule 2 and has been approved by the Chief Executive Officer of Waikato Regional Council; and</p> <p>5. A Farm Environment Plan which has been prepared in accordance with Schedule 1 and has been approved by a Certified Farm Environment Planner, is provided to the Waikato Regional Council as follows:</p> <p>a. By 1 July 2020 for properties or enterprises within Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</p> <p>b. By 1 July 2013 for properties or enterprises within Priority 2 sub-catchments listed in 3.11-2;</p> <p>c. By 1 July 2026 for properties or enterprises within Priority 3 sub-catchments listed in Table 3.11-2; and</p> <p>6. The use of land shall be undertaken in accordance with the actions and timeframes specified in the Farm Environment Plan; and</p> <p>7. The Farm Environment Plan provided under Condition 5 may be amended in accordance with the procedure set out in Schedule 1 and the use of land shall thereafter be undertaken in accordance with the amended plan; and</p> <p>8. A copy of the Farm Environment Plan amended in accordance with Condition (7) shall be provided to the Waikato Regional Council within 30 working days."]</p>	
		PC1-8113	Rule 3.11.5.4	WPL supports and

			<p>Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.4 to a permitted activity to read: "...Except provided for in Rule 3.11.5.1 and Rule 3.11.5.2 The use of land for farming activities (excluding commercial vegetable production) where that land use is <u>greater than 20 ha and</u> not 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 <u>subject to the following conditions: until:"</u>...</p> <p>AND DELETE clauses 1-5, 'Matters of control' and 'Dates' AND REPLACE with the following: <u>"1. The property is registered with the Waikato Regional Council in conformance with Schedule A;</u> <u>2. The Best Practicable Options set out in Schedule D are complied with;</u> <u>3. From 31 March 2018 the following information must be provided to the Waikato Regional Council by 1 September each year</u> <u>a. Annual stock number; and</u> <u>b. Annual fertiliser use; and</u> <u>c. Annual brought in animal feed.</u> <u>d. The requirements in Schedule A [note: a to d may not be necessary in light of (e)]</u> <u>e. A description of nutrient management practices including a nutrient budget for the farm enterprise calculated using the model OVERSEER in accordance with the OVERSEER use protocols, or using any other model or method approved by the Chief Executive Officer of Waikato Regional Council."</u></p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p>AND IF the relief sought [to change the controlled activity to a permitted activity] is not accepted THEN AMEND to address the matters raised in the submission including the matters of control</p> <p>AND AMEND PPC1 to add a NEW Schedule - Schedule D, Best Practicable Options for farming activities and where the permitted standards in schedule D cannot be complied with then restricted discretionary activity [refer to appendix 3 of the submission]. including:</p> <ul style="list-style-type: none"> • • waterways to be fenced and all domestic animals excluded (except sheep) with BMP buffers, • • basic stock intensity index applied, • • effluent, feedlot, standoff and feedpads to be managed, • • fertiliser and irrigation applied according to BMP code of practice, • • phosphorus application, arable cropping land winter forage crops limited, • • irrigation applied to a code of practice, • • commercial vegetable cropping BPOs developed <p>[The submission notes that Schedule D is an indicative approach to the type of Best Practicable Options for farming activities].</p>	
		V1PC1-1136	<p>Rule 3.11.5.4 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8113: [AMEND Rule 3.11.5.4 to a permitted activity to read: "...Except provided for in Rule 3.11.5.1 and Rule 3.11.5.2 The use of land for farming activities</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be</p>

			<p>(excluding commercial vegetable production) where that land use is <u>greater than 20 ha and</u> not 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 <u>subject to the following conditions: until:...</u></p> <p>AND DELETE clauses 1-5, 'Matters of control' and 'Dates' AND REPLACE with the following: <u>"1. The property is registered with the Waikato Regional Council in conformance with Schedule A;</u> <u>2. The Best Practicable Options set out in Schedule D are complied with;</u> <u>3. From 31 March 2018 the following information must be provided to the Waikato Regional Council by 1 September each year</u> <u>a. Annual stock number; and</u> <u>b. Annual fertiliser use; and</u> <u>c. Annual brought in animal feed.</u> <u>d. The requirements in Schedule A [note: a to d may not be necessary in light of (e)]</u> <u>e. A description of nutrient management practices including a nutrient budget for the farm enterprise calculated using the model OVERSEER in accordance with the OVERSEER use protocols, or using any other model or method approved by the Chief Executive Officer of Waikato Regional Council."</u></p> <p>AND IF the relief sought [to change the controlled activity to a permitted activity] is not accepted THEN AMEND to address the matters raised in the submission including the matters of control</p> <p>AND AMEND PPC1 to add a NEW Schedule -</p>	<p>allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p>Schedule D, Best Practicable Options for farming activities and where the permitted standards in schedule D cannot be complied with then restricted discretionary activity [refer to appendix 3 of the submission]. including:</p> <ul style="list-style-type: none"> • • waterways to be fenced and all domestic animals excluded (except sheep) with BMP buffers, • • basic stock intensity index applied, • • effluent, feedlot, standoff and feedpads to be managed, • • fertiliser and irrigation applied according to BMP code of practice, • • phosphorus application, arable cropping land winter forage crops limited, • • irrigation applied to a code of practice, • • commercial vegetable cropping BPOs developed <p>[The submission notes that Schedule D is an indicative approach to the type of Best Practicable Options for farming activities].]</p>	
		PC1-8225	<p>Rule 3.11.5.5 Oppose the provision with amendments</p> <p>DELETE Rule 3.11.5.5, AND AMEND to make changes as appropriate to reflect the reasons for the submission including: AMEND the matters of control so that it is clear that a decrease in Nitrogen Reference Point is mandatory and is achieved through the adoption of the Best Practicable Options, AND CLARIFY of how retirement of land from commercial vegetable production is to be managed AND AMEND to reduce the delay in practical mitigations being undertaken as part of Farm</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>Environment Plans requirements AND OR the alternative approach permitted activity proposed in the submission [Rule 5 in the alternative approach in the submission] IF the rule is retained as a controlled activity THEN AMEND the Matter of Control (iii) to read: "...iii. The actions and timeframes for undertaking the best practicable option mitigation actions that maintain or reduce the diffuse discharge of nitrogen..." AND DELETE matter of control (iv) AND AMEND so that for commercial vegetable production activities Best Practicable Option is implemented through permitted activity standards or a consented industry scheme [under the proposed Rule 3.11.5.4 [Rule 4 in the submission] AND AMEND to apply Best Practicable Option standards for commercial vegetable production consistent with the reduction achieved by Best Practicable Option standard for farming activities.</p>	
		V1PC1-	<p>Rule 3.11.5.5 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8225: [DELETE Rule 3.11.5.5, AND AMEND to make changes as appropriate to reflect the reasons for the submission including: AMEND the matters of control so that it is clear that a decrease in Nitrogen Reference Point is mandatory and is achieved through the adoption of the Best Practicable Options, AND CLARIFY of how retirement of land from commercial vegetable production is to be managed</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>AND AMEND to reduce the delay in practical mitigations being undertaken as part of Farm Environment Plans requirements</p> <p>AND OR the alternative approach permitted activity proposed in the submission [Rule 5 in the alternative approach in the submission]</p> <p>IF the rule is retained as a controlled activity THEN AMEND the Matter of Control (iii) to read: "...iii. The actions and timeframes for undertaking the best practicable option mitigation actions that maintain or reduce the diffuse discharge of nitrogen..."</p> <p>AND DELETE matter of control (iv)</p> <p>AND AMEND so that for commercial vegetable production activities Best Practicable Option is implemented through permitted activity standards or a consented industry scheme [under the proposed Rule 3.11.5.4 [Rule 4 in the submission]</p> <p>AND AMEND to apply Best Practicable Option standards for commercial vegetable production consistent with the reduction achieved by Best Practicable Option standard for farming activities.]</p>	
		PC1-13076	<p>Rule 3.11.5.6</p> <p>Oppose the provision with amendments</p> <p>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 to land where those contaminants may enter water including Best Management Practices to achieve Objective 3..."</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific</p>

				decisions sought by WPL in its own submissions.
		V1PC1-1186	<p>Rule 3.11.5.6 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission 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 to land where those contaminants may enter water including Best Management Practices to achieve Objective 3...</u>"]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-8707	<p>Rule 3.11.5.6 Oppose the provision with amendments</p> <p>AND AMEND to make changes as appropriate to reflect the reasons for the submission including the scope of Council's discretion to compel reductions to achieve the Objectives of PPC1 AND OR the alternative approach proposed in the submission [overview in Table 2 of the submission - Rule 6]. AND AMEND Rule 3.11.5.6 to read: "The use of land for farming activities or <u>commercial vegetation production</u> that does not comply with the conditions, standards or terms of Rule 3.11.5.1 to 3.11.5.5 and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>land in circumstances which may result in those contaminants entering water is a Restricted Discretionary Activity (requiring resource consent).</p> <p>Waikato Regional Council restricts its discretion over the following matters:...</p> <p>vii. The matters addressed by Schedules A, B and C.</p> <p><u>viii. The actions and timeframes for undertaking mitigation actions that reduce the diffuse discharges of activities nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water and whether those actions are likely to achieve the same or better reductions in those contaminants than the minimum standards under Rules 3.11.5.1, 3.11.5.4 and 3.11.5.5</u></p> <p><u>ix. the provision of information under Rules 3.11.5.1, 3.11.5.4 and 3.11.5.5.</u></p> <p><u>Applications should include the information requirements contained in Schedule 1</u></p> <p><u>The normal tests for notification apply."</u></p>	
		V1PC1-1185	<p>Rule 3.11.5.6</p> <p>Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8707: [AND AMEND to make changes as appropriate to reflect the reasons for the submission including the scope of Council's discretion to compel reductions to achieve the Objectives of PPC1 AND OR the alternative approach proposed in the submission [overview in Table 2 of the submission - Rule 6]. AND AMEND Rule 3.11.5.6 to read:</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by</p>

			<p>"The use of land for farming activities or <u>commercial vegetation production</u> that does not comply with the conditions, standards or terms of Rule 3.11.5.1 to 3.11.5.5 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 Restricted Discretionary Activity (requiring resource consent).</p> <p>Waikato Regional Council restricts its discretion over the following matters:...</p> <p>vii. The matters addressed by Schedules A, B and C.</p> <p><u>viii. The actions and timeframes for undertaking mitigation actions that reduce the diffuse discharges of activities nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water and whether those actions are likely to achieve the same or better reductions in those contaminants than the minimum standards under Rules 3.11.5.1, 3.11.5.4 and 3.11.5.5</u></p> <p><u>ix. the provision of information under Rules 3.11.5.1, 3.11.5.4 and 3.11.5.5.</u></p> <p><u>Applications should include the information requirements contained in Schedule 1</u></p> <p><u>The normal tests for notification apply."</u>]</p>	WPL in its own submissions.
		PC1-8716	<p>Rule 3.11.5.7</p> <p>Oppose the provision with amendments</p> <p>DELETE Rule 3.11.5.7 OR AMEND to make changes as appropriate to reflect the reasons for the submission including: AND OR the alternative approach proposed in the submission [overview</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and

			<p>in Table 2 of the submission - Rule 7]. IF the rule is retained then AMEND the notification provision to read: "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 OR AMEND Rules to incorporate Best Practicable Option for new farming activities into the permitted activity rules.</p>	<p>seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1167	<p>Rule 3.11.5.7 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8716: [DELETE Rule 3.11.5.7 OR AMEND to make changes as appropriate to reflect the reasons for the submission including: AND OR the alternative approach proposed in the submission [overview in Table 2 of the submission - Rule 7]. IF the rule is retained then AMEND the notification provision to read: "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</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			restricted to the implementation of Best Practicable Option and applicable to other farming activities OR AMEND Rules to incorporate Best Practicable Option for new farming activities into the permitted activity rules.]	
		PC1-8743	<p>Schedule B Oppose the provision with amendments</p> <p>DELETE Schedule B AND IF the alternative approach proposed in the submission is not accepted THEN AMEND Schedule B by requiring the provision of the parameter files or a certified XML file of the OVERSEER Model for the preparation of the Nitrogen Reference Point and to ensure that these files form part of the audit process and are provided to Waikato Regional Council as part of the Nitrogen Reference Point data. AND AMEND Clause (d) to read: "The Nitrogen Reference Point data shall comprise the electronic input, output and parameter files from the Overseer or other approved model..." AND AMEND Schedule B Clause (e) by changing the requirement to provide the Nitrogen Reference Point and data to the Council to within 6 months of data of the plan becoming operative (unless the period stipulated is earlier). AND ADD a NEW clause to Schedule B - Clause g to read: (viii) The information in Clause (d). AND 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.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1141	Schedule B	WPL opposes the

			<p>Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8743: [DELETE Schedule B AND IF the alternative approach proposed in the submission is not accepted THEN AMEND Schedule B by requiring the provision of the parameter files or a certified XML file of the OVERSEER Model for the preparation of the Nitrogen Reference Point and to ensure that these files form part of the audit process and are provided to Waikato Regional Council as part of the Nitrogen Reference Point data. AND AMEND Clause (d) to read: "The Nitrogen Reference Point data shall comprise the electronic input, output and parameter files from the Overseer or other approved model..." AND AMEND Schedule B Clause (e) by changing the requirement to provide the Nitrogen Reference Point and data to the Council to within 6 months of data of the plan becoming operative (unless the period stipulated is earlier). AND ADD a NEW clause to Schedule B - Clause g to read: (viii) The information in Clause (d). AND 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.]</p>	<p>submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-12475	<p>Schedule 1 Oppose the provision with amendments</p> <p>AMEND Schedule 1 to clarify the stock exclusion and setbacks requirements and amend wording is also too open in interpretation.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its</p>

				own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1180	Schedule 1 Oppose with amendments APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12475: [AMEND Schedule 1 to clarify the stock exclusion and setbacks requirements and amend wording is also too open in interpretation.]	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-12476	Schedule 1 Oppose the provision DELETE Clause (5) under Schedule 1.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1181	Schedule 1 Oppose	WPL opposes the submission because it

			APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12476: [DELETE Clause (5) under Schedule 1.]	is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-8806	<p>Schedule 1 Oppose the provision with amendments</p> <p>AMEND Schedule 1 to reflect the reasons for the submission and the proposed alternative approach including to set out the information requirement aspects of the Farm Environment Plan as part of the rules. If Schedule 1 is retained then 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 AND AMEND to specify Farm Environment Plan minimum standards to be complied with AND AMEND so that if a Farm Environment Plan is to be used to manage farming discharges it should cover all discharges regardless of whether they are diffuse or point source discharges AND AMEND to clarify the process that Farm Environment Plans can be amended.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1179	Schedule 1 Oppose with amendments	WPL supports and opposes the submission because it

			<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8806: [AMEND Schedule 1 to reflect the reasons for the submission and the proposed alternative approach including to set out the information requirement aspects of the Farm Environment Plan as part of the rules. If Schedule 1 is retained then 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 AND AMEND to specify Farm Environment Plan minimum standards to be complied with AND AMEND so that if a Farm Environment Plan is to be used to manage farming discharges it should cover all discharges regardless of whether they are diffuse or point source discharges AND AMEND to clarify the process that Farm Environment Plans can be amended.]</p>	<p>is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-8828	<p>Table 3.11-1</p> <p>AMEND Table 3.11-1 and the Objective of PPC1 to ensure consistency with the National Policy Statement for Freshwater Management 2014. AND 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.</p>	<p>WPL supports the submission because it is generally consistent with the decisions sought by WPL, and seeks that it should be allowed.</p>

		V1PC1-1144	<p>Table 3.11-1 Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8828 for 3.11.6 List of Tables and Maps: [AMEND Table 3.11-1 and the Objective of PPC1 to ensure consistency with the National Policy Statement for Freshwater Management 2014. AND 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.]</p>	<p>WPL supports the submission because it is generally consistent with the decisions sought by WPL, and seeks that it should be allowed.</p>
		PC1-12311	<p>Glossary of Terms Oppose the provision with amendments</p> <p>AMEND PPC1 by providing a definition of regionally significant industry that includes that Kinleith Industrial Park, for example, as follows: <u>"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:</u> <u>a) Wood processing plants;</u> <u>b) Dairy manufacturing sites;</u> <u>c) Meat processing plants;</u> <u>d) Mineral extraction activities; and e)</u> <u>Renewable energy generation."</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1146	<p>Glossary of Terms Oppose with amendments</p> <p>APPLY decision requested for Additions to</p>	<p>WPL supports and opposes the submission because it is generally consistent</p>

			<p>Glossary of Terms in accordance with the submitter's PPC1 submission PC1- 12311: [AMEND PPC1 by providing a definition of regionally significant industry that includes that Kinleith Industrial Park, for example, as follows: "<u>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:</u> <u>a) Wood processing plants;</u> <u>b) Dairy manufacturing sites;</u> <u>c) Meat processing plants;</u> <u>d) Mineral extraction activities; and e)</u> <u>Renewable energy generation."</u>]</p>	<p>with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-12312	<p>75th percentile nitrogen leaching value definition Oppose the provision</p> <p>REMOVE from the PPC1/ Glossary of terms - reference to the 75th percentile nitrogen leaching value.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		V1PC1-1147	<p>75th percentile nitrogen leaching value definition Oppose</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12312: [REMOVE from the PPC1/ Glossary of terms - reference to the 75th percentile nitrogen leaching value.]</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-8884	<p>Certified Farm Nutrient Advisor definition Oppose the provision with amendments</p>	<p>WPL supports and opposes the</p>

			<p>DELETE from the Glossary of terms the definition of a Certified Farm Nutrient Advisor, If the alternative approach not accepted then AMEND the definition of Certified Farm Nutrient Advisor to read: "Certified Farm Nutrient Advisor: is a person certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a Certified Farm Nutrient Advisor and has the following qualifications and experience: a. Has completed nutrient management training to at least intermediate level, and a person who has both <u> Holds a Certificate of Completion in Sustainable Nutrient Management in New Zealand Agriculture and a Certificate of Completion in Advanced Sustainable Nutrient Management from Massey University;</u> and b. Has experience in nutrient management planning." AND CONSIDER reference in the definition to other qualifications applicable to other predominant land uses may be appropriate, for example horticulture.</p>	<p>submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1148	<p>Certified Farm Nutrient Advisor definition Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8884: [DELETE from the Glossary of terms the definition of a Certified Farm Nutrient Advisor, If the alternative approach not accepted then AMEND the definition of Certified Farm Nutrient Advisor to read: "Certified Farm Nutrient Advisor: is a person certified by the Chief Executive Officer of Waikato Regional Council</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific</p>

			<p>and listed on the Waikato Regional Council website as a Certified Farm Nutrient Advisor and has the following qualifications and experience:</p> <p>a. Has completed nutrient management training to at least intermediate level, and a person who has both Holds a <u>Certificate of Completion in Sustainable Nutrient Management in New Zealand Agriculture</u> and a <u>Certificate of Completion in Advanced Sustainable Nutrient Management from Massey University</u>; and</p> <p>b. Has experience in nutrient management planning."</p> <p>AND CONSIDER reference in the definition to other qualifications applicable to other predominant land uses may be appropriate, for example horticulture.]</p>	<p>decisions sought by WPL in its own submissions.</p>
		PC1-8941	<p>Nitrogen Reference Point definition Oppose the provision with amendments</p> <p>DELETE the definition of the Nitrogen Reference Point</p> <p>IF the alternative approach proposed in the submission is not accepted then AMEND the definition of Nitrogen Reference Point to read: <u>"Nitrogen Reference Point means the nitrogen loss number (units of kg N/ ha/year that is based annually in accordance with the Code of Practice for Nutrient Management (NZ Fertiliser Manufacturers Glossary One Plan- 2014 Glossary-11 Research Association 2007) which records (including copies of the OVERSEER input, output and parameter files used to prepare the plan in accordance with Overseer Best Practice Date Input Standards) and takes into account all sources of nutrients for intensive farming and</u></p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<u>identifies all relevant nutrient management practices and mitigations. It must be prepared by Certified Farm Nutrient Advisor."</u>	
		V1PC1-1156	<p>Nitrogen Reference Point definition Oppose with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8941: [DELETE the definition of the Nitrogen Reference Point IF the alternative approach proposed in the submission is not accepted then AMEND the definition of Nitrogen Reference Point to read: "<u>Nitrogen Reference Point means the nitrogen loss number (units of kg N/ ha/year that is based on a nutrient management plan prepared annually in accordance with the Code of Practice for Nutrient Management (NZ Fertiliser Manufacturers Glossary One Plan- 2014 Glossary-11 Research Association 2007) which records (including copies of the OVERSEER input, output and parameter files used to prepare the plan in accordance with Overseer Best Practice Date Input Standards) and takes into account all sources of nutrients for intensive farming and identifies all relevant nutrient management practices and mitigations. It must be prepared by Certified Farm Nutrient Advisor."</u>]</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
P				
Pamu Farms of New Zealand	74000	PC1-5751	<p>General Oppose the provision</p> <p>AMEND PPC1 as outlined in this submission. AND ADD a NEW Policy and Rule so that discharges of Farm Dairy Effluent to waterways is</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks

			<p>prohibited from 1 July 2019. AND AMEND to list all OVERSEER assumed best practices and prohibit their non-attainment from 2020 wherever possible to clearly define. Or facilitate with the agriculture sector to define and prioritise this process in the near term of PPC1.</p> <p>AND RETAIN the agricultural initiatives for Total Suspended Solids and Phosphorus.</p> <p>AND AMEND so that unsealed roads, races, tracks, and drives (public or private) are subject to sediment control and runoff mitigations to TP10 standards or other Council derived standards.</p> <p>AND ADD to PPC1 provision for the Council to develop a framework and s32 analysis for a pollution tax for each of the four contaminants (Bacterial, Nitrogen, Phosphorus and suspended solids). State clear dates and reporting milestones (submission contains proposed text). Include a policy to facilitate the possible implementation by 2023.</p>	that it should be disallowed.
		PC1-6000	<p>Policy 6 Support the provision with amendments</p> <p>AMEND Policy 6 so that nitrogen loss is subject to Best Practicable Option analysis or include emphasis on the stocking rate as the highest determinant of modelled nitrogen loss.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

		PC1-5940	<p>Policy 7 Oppose the provision with amendments</p> <p>AMEND Policy 7 to provide for amending the regional plan fertiliser application permitted activities to restrict phosphorus based fertiliser application only to the individual paddocks where industry recognised agronomic Olsen P levels are deficient, phosphorus need is demonstrated and suppliers bonded or liable for non-conforming release.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-6007	<p>Rule 3.11.5.3 Support the provision with amendments</p> <p>RETAIN Rule 3.11.5.3 (1), (2) and (3).</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-6010	<p>Rule 3.11.5.4 Support the provision with amendments</p> <p>RETAIN Rule 3.11.5.4.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-6011	<p>Rule 3.11.5.6 Oppose the provision with amendments</p>	<p>WPL opposes the submission because it</p>

			AMEND Rule 3.11.5.6 to a discretionary activity.	is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-6013	Rule 3.11.5.7 Support the provision with amendments AMEND Rule 3.11.5.7 to reflect amendments requested in this submission.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-5849	Schedule B Oppose the provision AMEND Schedule B to state how suitable quality input parameters for alternative models will be developed. AND AMEND to provide for the use of farm specific or location specific data inputs, in particular clause (d). AND AMEND to provide greater flexibility for nitrogen emissions (only) from sheep/beef/deer operations on steep land. AND ADD a Rule for OVERSEER or enable other models to the same quality standards. AND AMEND clause (c) to provide for the 'most current version' of any model approach. AND AMEND to clarify the process for approval of cropping/agricultural impact models.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-12479	Schedule 1 Oppose the provision with amendments	WPL supports and opposes the

			AMEND Schedule 1 to clarify the intent and capture of clause 5(a) and (b) if they are retained.	submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-5753	Schedule 1 Oppose the provision AMEND Schedule 1 to provide funding and transparency for Certified Farm Environment Planners AND AMEND so that Farm Environment Plans are bonded to ensure that the attainment of targets is maximised. OR AMEND to list and prohibit bad on-farm practice in the areas that the Farm Environment Plan would seek to address.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-5818	Table 3.11-1 Oppose the provision with amendments AMEND 3.11.6 to clarify how Table 3.11-1 it will be applied. AND ADD to the Objectives the narrative from 3.11.6.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and

				seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-5752	Enterprise definition Oppose the provision with amendments AMEND in the Glossary of terms the Definition of Enterprise/s to clarify and allow for further analysis of the refined term, its application and implications.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-5932	Nitrogen Reference Point definition Oppose the provision with amendments AMEND in the Glossary of terms the Definition of Nitrogen Reference Point to separate temporal and model choice aspects, whilst retaining input quality protocols for alternative models.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
Perrin Ag Consultants Ltd	73859	PC1-3392	Rule 3.11.5.4 Oppose the provision AMEND Rule 3.11.5.4 to ensure that requirements to reduce nitrogen leaching to the 75th percentile nitrogen leaching value take into account factors such as soil type and management systems.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this

				would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-3394	<p>Rule 3.11.5.7 Oppose the provision</p> <p>AMEND Rule 3.11.5.7 so that land use change becomes a controlled activity under Rules 3.11.5.3 through to 3.11.5.5 from July 2019 (or the point at which Nitrogen Reference Points have been established) provided land use change does not result in nitrogen leaching above the Nitrogen Reference Point.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-3379	<p>Schedule B Oppose the provision</p> <p>AMEND Schedule B (g) 'Missing Data' to make provisions for farmers to choose the 75% of the average calculations OR the data for the year they have available. AND AMEND Schedule B to facilitate trading and transfer of nitrogen.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

<p>Primary Land Owners Group</p>	<p>71427</p>	<p>PC1-11128</p>	<p>Objective 1 Support the provision with amendments</p> <p>AMEND Objective 1 to revise the attributes in Table 3.11-1 to reflect achievable limits.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		<p>PC1-11132</p>	<p>Objective 3 Oppose the provision with amendments</p> <p>AMEND to adopt a sub-catchment management approach to ensure collaborative and fair allocation of the resources within the region, to achieve practicable reductions in discharges of contaminants across the Waikato and Waipā catchments.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		<p>PC1-11135</p>	<p>Objective 4 Support the provision with amendments</p> <p>AMEND PPC1 rules to give effect to Objective 4.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own</p>

				submissions, and seeks that it should be disallowed.
		PC1-12643	<p>Policy 1 Support the provision with amendments</p> <p>AMEND Policy 1(c) to read: 'Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes "<u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs</u>".'</p> <p>AND ADD a NEW point (d) to read "<u>Requiring farming activities on slopes exceeding 15 degrees (where break feeding does not occur) to manage contaminant discharges to water bodies through mitigation actions that specifically target critical source areas.</u>"</p> <p>AND AMEND to develop interpretation guidance of the rules and Schedule C in relation to determining slope and mandatory fencing requirements.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-11143	<p>Policy 1 Support the provision with amendments</p> <p>CONSIDER developing an improved measuring programme to gain more reliable data</p> <p>AND AMEND to clarify the definition of 'do not increase.'</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by

				WPL in its own submissions.
		PC-11147	<p>Policy 4 Support the provision with amendments</p> <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"...' AND AMEND the rules to provide future certainty for landowners AND DELETE the requirement for a Nitrogen Reference Point.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-11152	<p>Policy 6 Oppose the provision</p> <p>DELETE Policy 6.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-11153	<p>Policy 7 Oppose the provision with amendments</p> <p>AMEND Policy 7 to read: "Policy 7: Preparing for allocation in the future... <u>During stage 1, work collaboratively with relevant stakeholders and consented dischargers to develop a sub-catchment management approach to manage</u> Prepare for further diffuse</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be

			<p>discharge reductions and any future property or enterprise level allocation of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will be required by subsequent regional plans, by implementing the policies and methods in this chapter. To assist this process, collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability <u>for a range of uses and allocation.</u></p> <p>Any future a Allocation should consider the following principles..."</p>	<p>allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-11173	<p>Rule 3.11.5.2 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.2 to read: "The use of land for farming activities ...where the property area is greater than 4.1 hectares, and has more than <u>6 and less than 18 stock units per hectare</u> or is used for arable cropping, is a permitted activity subject to the following conditions:</p> <ol style="list-style-type: none"> 1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and 2. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs</u> and conditions 3(e) and 4(e) of this Rule; and 3. Where the property area is less than or equal 	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>to 20 hectares:</p> <p>...</p> <p>b. Where land is:</p> <p>i. used for grazing livestock, the stocking rate of the land is no greater than the stocking rate of the land at 22 October 2016; or</p> <p>ii. not used for grazing livestock, the land use has the same or lower diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens as the land use at 22 October 2016; and</p> <p>...</p> <p>e. Where the property or enterprise contains any of the water bodies listed in Schedule C, new fences installed after 22 October 2016 for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs must be located...</p> <p>4. Where the property or enterprise area is greater than 20 hectares:</p> <p>a. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B; and</p> <p>b. The discharge of nitrogen from the property or enterprise does not exceed either:</p> <p>i. the Nitrogen Reference Point; or</p> <p>ii. 15kg nitrogen/hectare/year, whichever is the lesser, over the whole property or enterprise when assessed in accordance with Schedule B; and</p> <p>c. No part of the property or enterprise over 15 degrees slope is cultivated or grazed <u>unless effects of diffuse discharges can be mitigated;</u> and</p> <p>...</p> <p>e. where the property or enterprise contains any of the water bodies listed in Schedule C:</p>	
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			<p>i. There shall be no cultivation within 5 metres of the bed of the water body <u>unless effects of diffuse discharges can be mitigated</u>; and</p> <p>ii. New fences installed after 22 October 2016 for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs must be located...</p> <p>5. For all properties greater than 4.1 hectares, from 31 March 2019, in addition to the requirement of Schedule A, the following information must be provided to the Waikato Regional Council by 1 September each year:</p> <p>a. Annual stock numbers; and</p> <p>b. Annual fertiliser use; and</p> <p>c. Annual brought in feed."</p>	
		PC1-11174	<p>Rule 3.11.5.3</p> <p>Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.3 to read: "2. A Nitrogen Reference Point i produce for the property or enterprise in conformance with Schedule B; and 3. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs</u>; and...</p> <p>...</p> <p>5. A Farm Environment Plan which has been prepared in accordance with Schedule 1 and has been approved by a Certified Farm Environment Planner, is provided to the Waikato Regional Council as follows:</p> <p>a. By 1 July 2020 for properties or enterprises within Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 15th</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>percentile nitrogen leaching value;</p> <p>b. By 1 July 2023 for properties or enterprises within Priority 2 sub-catchments listed in Table 3.11-2;</p> <p>c. By 1 July 2026 for properties or enterprises within Priority 3 sub-catchments listed in table 3.11-2; and"</p> <p>AND REMOVE the Nitrogen Reference Point from PPC1</p> <p>AND AMEND to adopt a sub-catchment approach addressing all four contaminants in proportion to their significance, and specific to each sub-catchment.</p>	
		PC1-11177	<p>Rule 3.11.5.4</p> <p>Support the provision with amendments</p> <p>AMEND Rule 3.11.5.4 to read: "...1. 1 January 2020 for properties or enterprises in Priority 1 sub-catchments listed in Table 3.11-2, and properties and enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value:</p> <p>...</p> <p>5. A Nitrogen Reference Point is produced for the property or enterprise in accordance with Schedule B; and</p> <p>After the dates set out in 1), 2) and 3) above the use of land shall be a controlled activity (requiring resource consent), subject to the following standards and terms:</p> <p>...</p> <p>c. A Nitrogen Reference Point is produced for property or enterprise in conformance with Schedule B and is provided to the Waikato Regional Council at the time the resource consent application is lodged;</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>d. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs.</u>"</p> <p>AND REMOVE the Nitrogen Reference Point from PPC1</p> <p>AND AMEND to align fencing requirements to align with the National Policy Statement for Freshwater Management.</p>	
		PC1-11178	<p>Rule 3.11.5.5</p> <p>Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.5 to read: "a. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</p> <p>b. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and provided to the Waikato Regional Council at the time the resource consent application is lodged; and</p> <p>...</p> <p>e. The areas of land and their locations broken down by sub-catchments [refer to Table 3.11-2] that were used for commercial vegetable production within the property or enterprise eachany year in the period 1 July 2006 to 30 June 2016, together with the maximum area of land used for commercial vegetable production within that period, shall be provided to the Council; and</p> <p>f. The total area of land for which consent is sought for commercial vegetable production must not exceed the maximum land area of the property or enterprise that was used for commercial vegetable production during the</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>period 1 July 2006 to 30 June 2016; and</p> <p>g. Where new land is proposed to be used for commercial vegetable production, an equivalent area of and must be removed from commercial vegetable production in order to comply with standard and term f; and</p> <p>h. A Farm Environment Plan for the property...</p> <p>...</p> <p>Matters of Control</p> <p>...</p> <p>iv. The actions and timeframes to ensure that the diffuse discharge of nitrogen does not increase beyond the Nitrogen Reference Point for the property or enterprise."</p> <p>AND AMEND to adopt a sub-catchment management approach</p> <p>AND AMEND to provide clarification on how land will move around the catchments with an enterprise under the proposed consent if provisions are retained.</p>	
		PC1-11179	<p>Rule 3.11.5.7</p> <p>Oppose the provision</p> <p>DELETE Rule 3.11.5.7</p> <p>AND AMEND PPC1 to enable change in land use in sub-catchments that meet Table 3.11-1 attribute targets as a permitted activity</p> <p>AND AMEND to introduce a new restricted discretionary activity consent to manage change in land use in high priority sub-catchments by adoption of applicable Best Practicable Option management innovation.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-11180	<p>Schedule B</p> <p>Oppose the provision</p>	WPL supports and opposes the submission because it

			<p>DELETE Schedule B AND REPLACE with a schedule detailing requirements for a Sub-Catchment Management Plan.</p>	<p>is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-11182	<p>Schedule 1 Support the provision with amendments</p> <p>AMEND Schedule 1 to read: "...2. An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens... (a) A description of where and how stock shall be excluded from water bodies for stock exclusion including: ...(ii) for areas with a with a slope exceeding 25 15 degrees and where stream fencing is impracticable, the provision of alternative mitigation measures. (b) A description of setbacks and riparian management, including: ...(ii) Where practicable the provision of minimum grazing setbacks from water bodies for stock exclusion of 1 metre for land with a slope of less than 15 degrees and 3 metres for land with a slope between 15 degrees and 25 degrees <u>where break feeding occurs</u>; and (iii) The provision of minimum cultivation setbacks of 5 metres <u>unless effects of diffuse</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>discharges can be mitigated.</u></p> <p>...(f) A description of cultivation management including:</p> <p>(i) The identification of slopes over 15 degrees and how cultivation on them will be avoided; unless contaminant discharges to water bodies from that cultivation can be avoided <u>mitigated</u>; and</p> <p>(ii) How the adverse effects of cultivation on slopes of less than 15 degrees will be mitigated through appropriate erosion and sediment controls for each paddock that will be cultivated including by:</p> <ul style="list-style-type: none"> • <u>assessing where overland flows enters and exits the paddock in rainfall events; and</u> • <u>identifying appropriate measures to divert overland flows from entering the cultivated paddock; and</u> • <u>identifying measures to trap sediment leaving the cultivated paddock in overland flows; and</u> • <u>maintaining appropriate buffers between cultivated areas and water bodies (minimum 5m setback).</u> • <u>A description of collected animal effluent management including how the risks associated with the operation of effluent systems will be managed to minimise contaminant discharges to groundwater or surface water.</u> • <u>A description of freshwater irrigation management including how contaminant loss arising from the irrigation system to groundwater or surface water will be minimised.</u> <p>3. A spatial risk map(s) at a scale that clearly shows:</p> <p>...(e) The location of continually flowing rivers, streams, and drains that exceed 1m wide and</p>	
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			<p>30cm deep on average and permanent lakes, ponds and wetlands; and</p> <p>...</p> <p>5. A description of the following:</p> <p>(a) Actions, timeframes and other measures to ensure that the diffuse discharge of nitrogen from the property or enterprise, as measured by the five year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified; or</p> <p>(b) Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026, except in the case of Rule 3.11.5.5."</p> <p>AND AMEND to provide guidance to clarify slope interpretation, fencing and stock watering and crossing requirements.</p>	
Q				
R				
Ravensdown Ltd	74058	PC1-10096	<p>Objective 1 Support the provision with amendments</p> <p>AMEND Objective 1 to retain the overall intent; Objective 1 should read: "Objective 1: Long term <u>maintenance</u>, restoration and/or protection of water quality as relevant for each sub- catchment and Freshwater Management Unit. ...result in achievement of the <u>maintenance</u>, restoration and/or protection <u>as relevant</u> of</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent</p>

			the..."	with the specific decisions sought by WPL in its own submissions.
		PC1-10099	Objective 3 Support the provision with amendments RETAIN the overall intent of Objective 3 while AMENDING it by adding: <u>"Note: the ten percent change required by this objective is an overall improvement in water quality. It may not be feasible for each attribute in Table 3.11-1 to be reduced by ten percent."</u>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10100	Objective 4 Support the provision RETAIN the intent of Objective 4 as currently written.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10101	Policy 1 Support the provision with amendments RETAIN the intent of Policy 1 while AMENDING it to read: "Manage and required reductions in sub-catchment-wide discharges of nitrogen,	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and

			phosphorus, sediment and microbial pathogens <u>and where over-allocated required reductions in these discharges, by:"</u>	seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10105	<p>Policy 4 Support the provision with amendments</p> <p>RETAIN the overall intent of Policy 4 but AMEND to address the following points: .</p> <ul style="list-style-type: none"> • Clarify the meaning of 'low discharging activity'; • Define the date at which an activity needs exist to be considered existing; • Provide guidance on how it can be demonstrated that a low discharge activity cumulatively does not compromise Objective 3 	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10107	<p>Policy 6 Oppose the provision with amendments</p> <p>AMEND Policy 6 as follows: "Except as provided for in Policy 16, land use change consent applications that demonstrate an increase in the diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens <u>which will potentially result in deterioration of water quality</u> will general not be granted. Land use change consent applications that demonstrate clear and enduring decreases an</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific

			<u>increase</u> in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens <u>which does not result in deterioration of water quality, or an overall decrease</u> will generally be granted."	decisions sought by WPL in its own submissions.
		PC1-10118	<p>Policy 7 Support the provision with amendments</p> <p>AMEND Policy 7 to retain the overall intent but reword for clarity and focus to read: "Prepare for further diffuse discharge reductions and any future property or enterprise-level allocation of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will be required by subsequent regional plans, by implementing the policies and methods in this chapter. To ensure this occurs, by <u>collecting</u> information and <u>undertakeing</u> research to support this, including:</p> <ul style="list-style-type: none"> • Collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges; and • Researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability' (refer to Schedule A)." <p>AND AMEND to include the detail regarding determining 'land suitability' in Schedule A.</p> 	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10130	<p>Method 3.11.4.7 Support the provision</p> <p>RETAIN the intent of Method 3.11.4.7 as it is currently written.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own

				submissions, and seeks that it should be disallowed.
		PC1-10140	<p>Rule 3.11.5.2 Support the provision with amendments</p> <p>RETAIN the permitted activity status of Rule 3.11.5.2 while addressing the following:</p> <ul style="list-style-type: none"> i. AMEND to simplify the conditions to ensure no checks or verifications are required and so a resource user has certainty that their activity is permitted, or requires a consent; ii. DELETE Condition 3b.ii iii. AMEND Schedule B to allow for a Nitrogen Reference Point to be determined over a four year period, and averaged over those four years. iv. AMEND to introduce a reference file approach to allow the 15kgN cap to move with updates of the OVERSEER Model. 	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-277	<p>Rule 3.11.5.2 Support with amendments</p> <p>RETAIN the V1 amendments in Rule 3.11.5.2(5) AND AMEND Rule 3.11.5.2 in accordance with Ravensdown's PPC1 submission (PC1-10140).</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

		V1PC1-1343	<p>Rule 3.11.5.2 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10140: [RETAIN the permitted activity status of Rule 3.11.5.2 while addressing the following: i. AMEND to simplify the conditions to ensure no checks or verifications are required and so a resource user has certainty that their activity is permitted, or requires a consent; ii. DELETE Condition 3b.ii iii. AMEND Schedule B to allow for a Nitrogen Reference Point to be determined over a four year period, and averaged over those four years. iv. AMEND to introduce a reference file approach to allow the 15kgN cap to move with updates of the OVERSEER Model.]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10144	<p>Rule 3.11.5.3 Support the provision with amendments</p> <p>RETAIN the permitted activity status and intent of Rule 3.11.5.3 subject to adopting amendments to Method 3.11.4.2. AND ADOPT the definitions sought in this submission relating to certification programmes.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-279	<p>Rule 3.11.5.3 Support with amendments</p>	<p>WPL supports and opposes the</p>

			<p>RETAIN the amended timeframes contained in Rule 3.11.5.3 (5) AND AMEND Rule 3.11.5.3 in accordance with Ravensdown's PPC1 submission (PC1-10144).</p>	<p>submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1344	<p>Rule 3.11.5.3 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10144: [RETAIN the permitted activity status and intent of Rule 3.11.5.3 subject to adopting amendments to Method 3.11.4.2. AND ADOPT the definitions sought in this submission relating to certification programmes.]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10148	<p>Rule 3.11.5.4 Support the provision with amendments</p> <p>RETAIN the permitted/controlled activity status of Rule 3.11.5.4. AND AMEND to split the rule into two parts to clarify when permitted activities become</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and</p>

			<p>controlled AND AMEND Matters of Control iv. as follows: "iv. Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure <u>reduce the diffuse losses discharge of nitrogen using best practicable options in keeping with industry agreed good management practice, prior to a nitrogen loss allocation system being decided and introduced is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026.</u>"</p>	<p>seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-280	<p>Rule 3.11.5.4 Support with amendments</p> <p>RETAIN the amended timeframes in Rule 3.11.5.4(1), (2) and the associated matters of control AND AMEND Rule 3.11.5.4 in accordance with Ravensdown's PPC1 submission (PC1-10148).</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1345	<p>Rule 3.11.5.4 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10148: [RETAIN the permitted/controlled activity status of Rule 3.11.5.4. AND AMEND to split the rule into two parts to</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the</p>

			clarify when permitted activities become controlled AND AMEND Matters of Control iv. as follows: "iv. Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure <u>reduce</u> the diffuse losses discharge of nitrogen <u>using best practicable options in keeping with industry agreed good management practice, prior to a nitrogen loss allocation system being decided and introduced is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026.</u> "	submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10154	Rule 3.11.5.5 Support the provision with amendments RETAIN the intent of Rule 3.11.5.5 as it is currently written, subject to addressing issues relating to the Nitrogen Reference Point, the Certified Industry Scheme and the qualifications of people to undertake nutrient budgets and Farm Environment Plans addressed elsewhere in this submission. AND DELETE standards and terms f. and g. from Rule 3.11.5.5 and re-number standards and terms h. as f.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-281	Rule 3.11.5.5 Support with amendments RETAIN the amended timeframe triggering controlled activity status under Rule 3.11.5.5 as notified AND AMEND Rule 3.11.5.5 in accordance with Ravensdown's PPC1 submission (PC1-	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and

			10154).	seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1346	<p>Rule 3.11.5.5 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10154: [RETAIN the intent of Rule 3.11.5.5 as it is currently written, subject to addressing issues relating to the Nitrogen Reference Point, the Certified Industry Scheme and the qualifications of people to undertake nutrient budgets and Farm Environment Plans addressed elsewhere in this submission. AND DELETE standards and terms f. and g. from Rule 3.11.5.5 and re-number standards and terms h. as f.]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10156	<p>Rule 3.11.5.6 Support the provision</p> <p>RETAIN Rule 3.11.5.6 as it is currently written.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10161	<p>Rule 3.11.5.7 Oppose the provision</p>	WPL supports and opposes the submission because it

			<p>AMEND Rule 3.11.5.7 as follows: "Rule 3.11.5.7 – Non-complying Activity – Land Use Change Notwithstanding any other rules in this Plan, and of the following changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the Waikato or Waipā catchments, where prior to 1 July 2026 the change exceeds 4.1 hectares <u>and there is an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens which will potentially result in deterioration of water quality:</u>"</p>	<p>is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10165	<p>Schedule B Support the provision with amendments</p> <p>RETAIN the intent of Schedule B. AND AMEND as follows: "a. The Nitrogen Reference Point must be calculated by a Certified Farm <u>Nutrient Management</u> Advisor to determine the amount of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point shall be determined through the Rule 3.11.5.7 consent process. c. The Nitrogen Reference Point must be calculated using the current version of the <u>OVERSEER Model and OVERSEER Best Practice Data Input Standards</u> (or any other model approved by the Chief Executive of the Waikato Regional Council). d. ...it must be calculated using the current version of the OVERSEER Best Practice Data Input Standards 2016, with the exception...</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>f. The reference period is the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016 <u>average of the previous – year period (12/13 – 15/16).</u>"</p> <p>AND ADOPT the definitions sought in this submission relating to certification programmes.</p>	
		V1PC1-284	<p>Schedule B Support the provision with amendments</p> <p>RETAIN the amended timeframes in (e) of Schedule B (e) as notified AND AMEND Schedule B in accordance with Ravensdown's PPC1 submission (PC1-10165).</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		V1PC1-1347	<p>Schedule B Support the provision with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10165: [RETAIN the intent of Schedule B. AND AMEND as follows: "a. The Nitrogen Reference Point must be calculated by a Certified Farm <u>Nutrient Management</u> Advisor to determine the amount of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point shall be determined through the Rule 3.11.5.7 consent process. c. The Nitrogen Reference Point must be calculated using the current version of the OVERSEER Model <u>and OVERSEER Best Practice</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>Data Input Standards</u> (or any other model approved by the Chief Executive of the Waikato Regional Council).</p> <p>d. ...it must be calculated using the current version of the OVERSEER Best Practice Data Input Standards 2016, with the exception...</p> <p>f. The reference period is the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016 <u>average of the previous – year period (12/13 – 15/16).</u>"</p> <p>AND ADOPT the definitions sought in this submission relating to certification programmes.]</p>	
		PC1-10174	<p>Schedule 1 Support the provision with amendments</p> <p>RETAIN the intent of Schedule 1. AND AMEND as follows: "2. (e) A description of nutrient management practices including a nutrient budget <u>prepared by a Certified Nutrient Management Advisor</u> for the farm enterprise calculated using the OVERSEER Model in accordance with the OVERSEER use protocols <u>Data Input Standards 2016, with the exceptions and inclusions set out in Schedule B, Table 1,</u> or using any other model or method approved by the Chief Executive Officer of Waikato Regional Council. <u>The nutrient budget is to be valid for three years, unless there is a change in the farm system that requires the nutrient budget to be reviewed earlier.</u>"</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-12502	<p>Schedule 1 Oppose the provision with amendments</p>	WPL supports and opposes the submission because it

			<p>RETAIN the intent of Schedule 1. AND AMEND as follows: "5. (b) Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse loss discharge of nitrogen is reduced <u>using best practicable options in keeping with industry agreed good management practice, prior to a nitrogen loss allocation system being decided and introduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026, except in the case of Rule 3.11.5.5.</u>"</p> <p>AND AMEND to address the following matters in the Schedule 1 table of vegetable growing minimum standards:</p> <ol style="list-style-type: none"> 1. No. 2 and 3 Nitrogen, Phosphorus – fertiliser plans should be prepared by Certified Nutrient Management Advisors 2. No. 4 Nitrogen, Phosphorus – annual calibration of fertiliser delivery systems could be a problem – many growers have their own spreading equipment. 3. No. 6 Nitrogen, Phosphorus – not all commercial spreaders have the capability to document proof of fertiliser placement. 4. No. 8 Nitrogen, Phosphorus – what constitutes 'evidence' needs clarification for growers who self-apply and for commercial entities who are not set up with GIS/GPS capability. 	<p>is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10213	<p>Table 3.11-1</p> <p>CLARIFY in PPC1 how the 10% change in water quality will be determined.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points</p>

				made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10199	<p>Certified Farm Nutrient Advisor definition Oppose the provision</p> <p>DELETE the definition of Certified Farm Nutrient Advisor and replace it with the following definition: <u>"Certified Nutrient Management Advisor: is nutrient management adviser certified under the Nutrient Management Adviser Certification Programme Ltd. Or approved by the Chief Executive Officer of Waikato Regional Council as equivalent.</u> (see http://www.nmacertification.org.nz for details)."</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10202	<p>Nitrogen Reference Point definition Support the provision with amendments</p> <p>AMEND the definition of Nitrogen Reference Point as follows:</p> <ol style="list-style-type: none"> 1. Refer to Schedule B that provides the process to determine the Nitrogen Reference Point 2. Reference OVERSEER Data Input Standards 	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this

			<p>3. Reference the Certified Nutrient Management Adviser Programme</p> <p>4. Clarify what 'protocol compliant' means</p>	would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-285	<p>75th percentile nitrogen leaching value definition Support with amendments</p> <p>RETAIN the amended timeframes contained in the Definition - 75th percentile nitrogen leaching value, as notified AND AMEND the definition in accordance with the submitter's PPC1 submission. [However, there was no relief identified for this definition in the PPC1 submission].</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
Rayonier Matariki Forests	73159	PC1-9581	<p>Rule 3.11.5.7 Oppose the provision</p> <p>DELETE Rule 3.11.5.7.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
Rotorua Lakes Council	73373	PC1-2466	<p>Objective 1 Support the provision</p> <p>RETAIN Objective 1.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks

				that it should be disallowed.
		PC1-2468	<p>Objective 4 Support the provision with amendments</p> <p>AMEND Objective 4 to read: "<u>A staged approach to changing the management of discharges of contaminants that enables people and communities to provide for their social, cultural and economic well-being for the period to 2016, while:</u></p> <ul style="list-style-type: none"> • <u>Restoring the values and uses for the Waikato and Waipā Rivers</u> • <u>Taking actions to achieve the attribute targets for the Waikato and Waipā Rivers in Table 3.11-1; and</u> • <u>Recognising that further reductions will be required by subsequent regional plans.</u>" <p>AND MAKE any consequential amendments.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-2470	<p>Policies 3.11.3 Support the provision</p> <p>AMEND 3.11.3 Policies by adding a new policy as follows: "<u>Policy X: New and intensified urban development.</u> <u>Allow urbanisation of land that gives effect to the Waikato Regional Policy Statement and Territorial Authority Spatial Plans which will result in increased volumes of storm water and treated wastewater and may result in increased discharge of contaminants. It is also recognised that given improvements in waste water treatment technology and urban design, urban</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p><u>development can and will over the coming years become more effective at removing contaminants relative to other land uses.</u>"</p> <p>AMEND 3.11.3 Policies by adding a new policy as follows: <u>"Policy X: Consideration of the effects of land use change on discharges.</u> <u>When considering a consent application to discharge contaminants from a proposed change in land use, take into account any changes in contaminant load and profile, alongside the contaminants associated with the new activity for which consent is being sought."</u></p> <p>AND MAKE any consequential amendments.</p>	
		PC1-2504	<p>Policy 6 Oppose the provision with amendments</p> <p>AMEND Policy 6 so the first sentence reads as: <u>"Except as provided for in Policies X, 10, 11, 12 and 16, 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."</u></p> <p>AND MAKE any consequential amendments.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-2505	<p>Policy 7 Support the provision with amendments</p> <p>AMEND Policy 7 to read as: <u>"Any future allocation should consider the following principles: a) Land suitability which reflects the natural capacity of the land based on its Land Use Capability class to attenuate contamination loss, other biophysical and climate properties, the risk of contaminant discharges</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this</p>

			<p><u>from that land...</u>" AND MAKE any consequential amendments.</p>	<p>would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-2520	<p>Rules 3.11.5 Oppose the provision</p> <p>AMEND rules under 3.11.5 by changing the dates required for property registration, Farm Environment Plans and calculation of Nitrogen Reference Points so that a reasonable time is allowed following PPC1 becoming operative AND ANY consequential amendments.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-2522	<p>Rule 3.11.5.7 Oppose the provision</p> <p>REPLACE Rule 3.11.5.7 with a rule that specifies land use changes listed are a discretionary activity with specific criteria to measure applications against including whether the loss of contaminants will be the same or lower than the existing land use. AMEND Rule 3.11.5.7 and the associated definitions to make it clear how horticulture/ viticulture and intensive outdoor animal rearing are covered by the rule. AND AMEND by providing an explanation of how the rule is to be administrated where there is a</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>mix of varied land use changes within the same property or enterprise. AND ANY consequential amendments.</p>	
		PC1-2533	<p>Schedule B Oppose the provision with amendments</p> <p>AMEND Schedule B to include caps based primarily on the ability of the land to attenuate contaminant leaching by tying limits to the land's Land Use Capability class. AND MAKE any consequential amendments.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
S				
Save Lake Karapiro Inc	72459	PC1-5634	<p>Objective 3 Oppose the provision</p> <p>REMOVE the timeframe in Objective 3. AND AMEND PPC1 to require best current practices to be used for all polluting activities. AND AMEND PPC1 to require the most polluting activities be subject to the greatest mitigation requirements, penalties, oversight, research, measurement and regulation. Ensure however that there is room to innovate mitigations as new practices and methods develop.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

		PC1-5609	<p>Policy 1 Oppose the provision</p> <p>AMEND Policy 1 so that where there are numerous permissions or consents within a catchment for common activities the overall effect of the total number of them is regarded and addressed both as individual and in the aggregate rather than as solely individual.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-5703	<p>Policy 7 Oppose the provision</p> <p>REMOVE the use of allocations or benchmarking. (Policy 7) AND AMEND to use pollution levies based on the outputs above the assimilative capacity of land. AND REPLACE the use of OVERSEER with a measuring system that works.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-5742	<p>Method 3.11.4.11 Oppose the provision</p> <p>AMEND Method 3.11.4.11 so the accounting system must measure, monitor and publish all recorded metrics and audits from industry schemes in a way that is transparent, clear and accessible to the public.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent</p>

				with the specific decisions sought by WPL in its own submissions.
		PC1-5709	<p>Rule 3.11.5.3 Oppose the provision</p> <p>REMOVE the use of OVERSEER or any other measuring tool in PPC1 until it is accurate both relatively and absolutely. Rule 3.11.5.3 AND DELETE the use of benchmarking or allocation. AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives. AND AMEND PPC1 to prohibit and strongly prosecute the worst practices maintaining pressure on the 'tail' as it improves. AND research a series of mitigations with strong data to support their efficacy and help introduce them. These will in combination with pollution levies have the greatest and fastest effect on water pollution.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-5711	<p>Rule 3.11.5.4 Oppose the provision</p> <p>REMOVE the use of OVERSEER or any other measuring tool in PPC1 until it is accurate both relatively and absolutely. (Rule 3.11.5.4) AND DELETE the use of benchmarking or allocation. AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives. AND AMEND PPC1 to prohibit and strongly</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.

			<p>prosecute the worst practices maintaining pressure on the 'tail' as it improves. AND research a series of mitigations with strong data to support their efficacy and help introduce them. These will in combination with pollution levies have the greatest and fastest effect on water pollution. Proportionality DELETE the use of a proportional system in PPC1 and REPLACE with pollution levies. Allocation REMOVE the use of allocations or benchmarking. AND AMEND to use pollution levies based on the outputs above the assimilative capacity of land. AND REPLACE the use of Overseer with a measuring system that works. Self Management DELETE the use of industry self management schemes.</p>	
		PC1-5716	<p>Rule 3.11.5.5 Oppose the provision</p> <p>Nitrogen Reference Point REMOVE the use of the OVERSEER Model or any other measuring tool in PPC1 until it is accurate both relatively and absolutely. (Rule 3.11.5.5) AND DELETE the use of benchmarking or allocation. AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives. AND AMEND PPC1 to prohibit and strongly prosecute the worst practices maintaining pressure on the 'tail' as it improves. AND research a series of mitigations with strong data to support their efficacy and help introduce</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>

			<p>them. These will in combination with pollution levies have the greatest and fastest effect on water pollution.</p> <p>Proportionality DELETE the use of a proportional system in PPC1 and REPLACE with pollution levies.</p> <p>Allocation REMOVE the use of allocations or benchmarking. AND AMEND to use pollution levies based on the outputs above the assimilative capacity of land. AND REPLACE the use of Overseer with a measuring system that works.</p>	
		PC1-5717	<p>Schedule B Oppose the provision</p> <p>REMOVE (Nitrogen Reference Point- Schedule B) the use of the OVERSEER Model or any other measuring tool in PPC1 until it is accurate both relatively and absolutely AND DELETE the use of benchmarking or allocation AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives AND AMEND PPC1 to prohibit and strongly prosecute the worst practices maintaining pressure on the 'tail' as it improves AND research a series of mitigations with strong data to support their efficacy and help introduce them. These will in combination with pollution levies have the greatest and fastest effect on water pollution.</p> <p>Allocation REMOVE the use of allocations or benchmarking AND AMEND to use pollution levies based on the outputs above the assimilative capacity of land</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			AND REPLACE the use of Overseer with a measuring system that works.	
		PC1-5719	<p>Schedule 1 Oppose the provision</p> <p>Nitrogen Reference Point REMOVE the use of the OVERSEER Model or any other measuring tool in PPC1 until it is accurate both relatively and absolutely. AND DELETE the use of benchmarking or allocation. AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives. AND AMEND PPC1 to prohibit and strongly prosecute the worst practices maintaining pressure on the 'tail' as it improves. AND research a series of mitigations with strong data to support their efficacy and help introduce them. These will in combination with pollution levies have the greatest and fastest effect on water pollution.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-12510	<p>Schedule 1 Oppose the provision</p> <p>Farm Environment Plans AMEND Schedule 1 so where stock intensity exceeds a critical value the BMP must be to increase the fenced margin. For land 10-15 degrees increase the setbacks to at least 3m.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
South Waikato District Council	72892	PC1-4032	<p>Objective 3 Oppose the provision with amendments</p> <p>REPLACE Objective 3 with: "<u>Changes to water</u></p>	NRP

			<u>management and land use are implemented by 2026 that achieve 10% of the required change between current water quality and the 80-year water quality attribute targets in Table 3.11-1 in the period desirably to 2036.</u> "	
		PC1-4034	Objective 4 Oppose the provision with amendments AMEND Objective 4 to read: "A staged approach to <u>land use</u> change enables people and communities to undertake adaptive management to continue to provide for their is managed to minimise the impacts of transition on the social, economic and cultural well-being of communities in the short term." AMEND the reasons accordingly.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-4036	Policy 1 Support the provision with amendments AMEND Policy 1 to incorporate an agreed, measurable and enforceable baseline for each of the four diffuse discharges from which these general terms can be measured or benchmarked.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

		PC1-4040	<p>Policy 4 Support the provision with amendments</p> <p>AMEND Policy 4 to read: "<u>Enable activities with discharges of of low volumes and concentrations of contaminants to continue or to establish while signalling further contaminant reductions may be required.</u>"</p> <p>AND AMEND to provide for agreed, measurable and enforceable baselines for each of the four diffuse discharges that are required to be monitored on a case by case basis.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-4042	<p>Policy 6 Oppose the provision</p> <p>DELETE the first sentence of Policy 6. AND AMEND the remaining sentence to clarify what is meant by '...demonstrate clear and enduring decreases in existing diffuse discharges.'</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-4044	<p>Policy 7 Oppose the provision with amendments</p> <p>DELETE the first paragraph of Policy 7</p>	<p>WPL supports and opposes the submission because it is generally consistent</p>

			<p>AND AMEND the sentence commencing 'Any future allocation should consider...' to incorporate the footnote.</p> <p>AND RETAIN clause c.</p> <p>AND AMEND to ensure the matters listed under Policy 16 i-iii are consistent with and reflected in Policy 7.</p>	<p>with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-4206	<p>Rule 3.11.5.2</p> <p>Support the provision with amendments</p> <p>Confirm that the approaches in Rule 3.11.5.2 introductory sentence, (3)(b)(i) and (ii), (4)(a), (4)(c), (4)(e)(i) and (ii), 4(d), 5(a)-(c) meet the section 32 efficiency and effectiveness tests, otherwise REMOVE the standards</p> <p>AND AMEND Rule 3.11.5.2(3)(a) to read: "The farming activities do not form part of an enterprise being undertaken on more than one property <u>within the Waikato River and Waipā River catchments.</u>"</p> <p>AND CONSIDER alternative approaches that incorporate the use of performance standards for the range of primary production activities that are able to establish as 'small and low intensity farming activities' (currently defined under Rules 3.11.5.1 and 3.11.5.2) throughout the region.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-383	<p>Rule 3.11.5.2</p> <p>Oppose with amendments</p> <p>DELETE the amended dates proposed in Rule 3.11.5.2 (5)</p> <p>AND REPLACE with suitable alternative dates that</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its</p>

			are practical and capable to achieve for landowners and/or farmers, as well as Waikato Regional Council as the regulators who will implement PPC1.	own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-384	<p>Rule 3.11.5.3 Oppose with amendments</p> <p>DELETE the amended dates proposed in Rule 3.11.5.3(5) AND REPLACE with suitable alternative dates that are practical and capable to achieve for landowners and/or farmers, as well as Waikato Regional Council as the regulators who will implement PPC1.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-4216	<p>Rule 3.11.5.4 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.4 to provide an allocation approach with rules and performance standards to manage nutrient discharges and water quality and work with landowners, sector groups and communities to provide alternative practicable measures to achieve the same environmental outcomes.</p>	WPL supports the submission because it is generally consistent with the decisions sought by WPL, and seeks that it should be allowed.
		V1PC1-386	<p>Rule 3.11.5.4 Oppose with amendments</p> <p>DELETE the amended dates proposed in Rule 3.11.5.4</p>	WPL supports and opposes the submission because it is generally consistent with the key points

			AND REPLACE with suitable alternative dates that are practical and capable to achieve for landowners and/or farmers, as well as Waikato Regional Council as the regulators who will implement PPC1.	made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-387	<p>Rule 3.11.5.5 Oppose with amendments</p> <p>DELETE all amended dates proposed in Rule 3.11.5.5, including those in the advisory note AND REPLACE with suitable alternative dates that are practical and capable to achieve for landowners and/or farmers, as well as Waikato Regional Council as the regulators who will implement PPC1.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-4220	<p>Rule 3.11.5.7 Oppose the provision</p> <p>AMEND Rule 3.11.5.7 to be no more restrictive than a discretionary activity. AND CONSIDER reviewing the reasons for adopting Rule 3.11.5.7 and the justification under section 32 regarding the efficiency and effectiveness of this method and rule. AND CONSIDER working with landowners, sector</p>	WPL supports the submission because it is generally consistent with the decisions sought by WPL, and seeks that it should be allowed.

			groups and communities to provide alternative practicable measures to achieve the same environmental outcomes.	
		PC1-4161	<p>Schedule B Oppose the provision with amendments</p> <p>AMEND Schedule B to provide an effects based approach to contaminant management including nitrogen leaching AND AMEND Schedule B to read: "A property or enterprise with a cumulative area greater than 20 hectares (or any property or enterprise used for commercial vegetable production) must have a nitrogen Reference Point calculated as follows..." AND AMEND to provide evidence that the section 32 evaluation confirms clause a and Table 1 are the preferred approach to adopt and there are appropriately qualified and experienced professionals able to provide this information.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-389	<p>Schedule B Oppose with amendments</p> <p>DELETE the amended dates proposed in Schedule B(e) AND REPLACE with suitable alternative dates that are practical and capable to achieve for landowners and/or farmers, as well as Waikato Regional Council as the regulators who will implement PPC1.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-4171	<p>Schedule 1 Oppose the provision with amendments</p> <p>Provide evidence that the section 32 evaluation</p>	WPL supports and opposes the submission because it is generally consistent

			<p>confirms Schedule 1 is the preferred approach to adopt regarding the efficiency and effectiveness of this method and rule</p> <p>AND AMEND to work with landowners, sector groups and communities to provide alternative practicable measures to achieve the same environmental outcomes.</p>	<p>with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-12522	<p>Schedule 1</p> <p>Oppose the provision with amendments</p> <p>Schedule 1 - AMEND the extent, complexity and information requirements for Farm Environment Plans to reduce potential consultancy, compliance and audit costs to the landowner and regulator.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-12523	<p>Schedule 1</p> <p>Oppose the provision with amendments</p> <p>AMEND to simplify the extent, complexity and information requirements of Schedule 1 clause 2(b). AND provide information to justify the current approach in terms of the effectiveness and efficiency tests under section 32 in relation to Schedule 1 clause 2(b).</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be</p>

				allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-9724	<p>Glossary of Terms Support the provision with amendments</p> <p>ADD a definition for regionally significant infrastructure: "<u>Regionally significant infrastructure means 'municipal wastewater treatment plants, water supply treatment plants and bulk water supply, wastewater conveyance and storage systems, municipal supply dams and ancillary infrastructure.'</u>" AND ADD a definition of <u>regionally significant industry: "Regionally significant industry means 'an economic activity based on 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 or a combination thereof Regional significant industry includes:</u> a) <u>Dairy manufacturing sites;</u> b) <u>Meat processing plants; and</u> c) <u>Pulp and paper processing plants."</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
T				
Taupo District Council	74207	PC1-8096	<p>Objective 1 Support the provision</p> <p>RETAIN the intent of Objective 1.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be

				disallowed.
		PC1-8100	Objective 3 Support the provision RETAIN the intent of Objective 3.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-8102	Objective 4 Support the provision AMEND to clarify what the staged approach means, AND AMEND to clarify what is intended by the term 'short-term'.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-8108	Policy 1 Support the provision RETAIN the intent of Policy 1.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-8110	Policy 7	WPL supports and

			<p>Support the provision with amendments</p> <p>AMEND Policy 7 to ensure that further allocation systems and processes recognise the efforts made to reduce contaminants prior to PPC1, in a similar manner to that outlined in Policy 12.</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-8127	<p>Method 3.11.4.7</p> <p>Support the provision</p> <p>RETAIN the intent of Method 3.11.4.7.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-8128	<p>Method 3.11.4.8</p> <p>Support the provision with amendments</p> <p>AMEND Method 3.11.4.8 to develop an allocation framework that rewards changes in land use management that have resulted in reduced diffuse discharges</p> <p>AND ENSURE that Taupo District Council is involved in the development of the allocation framework.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by</p>

				WPL in its own submissions.
		PC1-8164	<p>Rule 3.11.5.2 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.2 to ensure that stocking rates and discharges are based on a 5 year average prior to 22 October 2016.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-8168	<p>Rule 3.11.5.3 Support the provision</p> <p>RETAIN the use of a Certified Industry Scheme as provided for in Rule 3.11.5.3.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-8169	<p>Schedule B Support the provision with amendments</p> <p>Ensure that Taupō District Council is involved in the development of the allocation framework. Schedule B.</p>	WPL supports the submission because it is generally consistent with the decisions sought by WPL, and seeks that it should be allowed.
		PC1-8170	Table 3.11-1	WPL supports and

			<p>Support the provision with amendments</p> <p>AMEND Table 3.11-1 to accurately label the table number reference on each page AND AMEND to include a map illustrating the location of the monitoring sites.</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-8171	<p>Farming activities definition</p> <p>Support the provision with amendments</p> <p>RETAIN the definition for farming activities, AND AMEND to clarify whether the harvesting of grass (cut and carry) is considered growing of crops, AND AMEND to exclude the use of stock to reduce grass cover for fire reduction purposes from farming activities.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
Te Whakakitenga o Waikato Inc (Waikato-Tainui)	74105	PC1-7456	<p>Objective 1</p> <p>Support the provision with amendments</p> <p>RETAIN the 80-year timeframe in Objective 1. AND AMEND Objective 1 to read: "By 2096, <u>at the latest, or sooner where practicable,</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its</p>

			discharges of nitrogen..."	own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1448	Objective 1 Support with amendments APPLY decision requested in accordance with the submitter's PPC1 submission PC1-7456: [RETAIN the 80-year timeframe in Objective 1. AND AMEND Objective 1 to read: "By 2096, <u>at the latest, or sooner where practicable,</u> discharges of nitrogen..."]	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-7589	Objective 3 Support the provision RETAIN Objective 3.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1428	Objective 3 Support	WPL opposes the submission because it

			APPLY decision requested in accordance with the submitter's PPC1 submission PC1-7589: [RETAIN Objective 3.]	is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-7592	Objective 4 Support the provision RETAIN Objective 4.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1429	Objective 4 Support APPLY decision requested in accordance with the submitter's PPC1 submission PC1-7592: [RETAIN Objective 4.]	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-7804	Policy 1 Support the provision RETAIN Policy 1.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1431	Policy 1 Support	WPL opposes the submission because it is not consistent with

			APPLY decision requested in accordance with the submitter's PPC1 submission PC1-7804: [RETAIN Policy 1.]	the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-7818	Policy 4 Support the provision RETAIN Policy 4.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1434	Policy 4 Support APPLY decision requested in accordance with the submitter's PPC1 submission PC1-7818: [RETAIN Policy 4.]	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-7848	Policy 6 Support the provision with amendments 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 in the discharge of</u>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by

			<u>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>	WPL in its own submissions.
		V1PC1-1452	<p>Policy 6 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-7848: [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 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>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-7850	<p>Policy 7 Support the provision with amendments</p> <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</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the

			<p><u>management regime. ...</u></p> <p>c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..."</p> <p>AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria:..</p> <p>c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."</p>	<p>submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1453	<p>Policy 7 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-7850: [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></p> <p>c. Minimise social disruption and costs in transition to the 'land suitability' any new approach..."</p> <p>AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability will <u>may</u> consider the following criteria:..</p> <p>c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-8038	<p>Method 3.11.4.7 Support the provision with amendments</p>	<p>WPL supports and opposes the submission because it</p>

			<p>AMEND Method 3.11.4.7 to read: "Gather information and commission... any future framework for the allocation of diffuse discharges <u>by 2026</u> including:</p> <p>a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits in the future ...</p> <p><u>iv. Detailed evaluation of the range of options (including economic instruments) that are available to allocate rights to discharge contaminants from land use.</u>"</p>	<p>is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1463	<p>Method 3.11.4.7 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8038: [AMEND Method 3.11.4.7 to read: "Gather information and commission... any future framework for the allocation of diffuse discharges <u>by 2026</u> including:</p> <p>a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits in the future ...</p> <p><u>iv. Detailed evaluation of the range of options (including economic instruments) that are available to allocate rights to discharge contaminants from land use.</u>"]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-8045	<p>Method 3.11.4.8 Support the provision with amendments</p> <p>AMEND Method 3.11.4.8 to read: "...b. Use this to inform future <u>the best available information to develop</u> changes to the Waikato Regional Plan <u>by 2026</u> to manage discharges..."</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and</p>

				seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1464	<p>Method 3.11.4.8 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8045: [AMEND Method 3.11.4.8 to read: "...b. Use this to inform future <u>the best available information to develop</u> changes to the Waikato Regional Plan <u>by 2026</u> to manage discharges..."]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-8066	<p>Method 3.11.4.11 Support the provision with amendments</p> <p>AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. Review and report <u>Report on the progress</u> towards and achievement of the <u>10-year (Objective 3) and 80-year (Objective 1) water quality objectives of Chapter 3.11 targets in 2020 and 2024.</u>" AND DELETE 3.11.4.11 b.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific

				decisions sought by WPL in its own submissions.
		V1PC1-982	<p>Method 3.11.4.11</p> <p>ADD a NEW bullet point to Method 3.11.4.11 that reads: <u>Review and report on the progress towards and achievement of 'Mana Tangata - protecting and restoring tā ngata whenua values, including cultural and spiritual well-being' objectives of Chapter 3.11.</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1467	<p>Method 3.11.4.11</p> <p>Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8066: [AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. Review and report <u>Report</u> on the progress towards and achievement of the <u>10-year (Objective 3) and 80-year (Objective 1) water quality objectives of Chapter 3.11 targets in 2020 and 2024.</u>" AND DELETE 3.11.4.11 b.]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-8078	Rule 3.11.5.2	WPL opposes the

			Support the provision with amendments AMEND Rule 3.11.5.2 by ADDING the words: <u>"Note: Rule 3.11.5.2 shall be the subject of a detailed effectiveness review at 2020 and 2024."</u>	submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-983	Rule 3.11.5.2 Support RETAIN the V1 amendments to Rule 3.11.5.2(5).	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1468	Rule 3.11.5.2 Support with amendments APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8078: [AMEND Rule 3.11.5.2 by ADDING the words: <u>"Note: Rule 3.11.5.2 shall be the subject of a detailed effectiveness review at 2020 and 2024."</u>]	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-8079	Rule 3.11.5.3 Support the provision with amendments AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan provided <u>approved</u> under Condition 5 may..." AND ADD <u>"Note: For the purpose of Rule 3.11.5.3, any property or enterprise that is deemed by the Council to be non-compliant</u>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this

			<p><u>shall be considered subject to Rule 3.11.5.6.</u>"</p> <p>OR</p> <p>AMEND Rule 3.11.5.3 to be a controlled activity with the matters of control being set out in amended Schedule 2.</p> <p>AND AMEND to ensure the Waikato and Waipa River Iwi are notified of all applications to Waikato Regional Council for Certified Industry Schemes.</p>	would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-985	<p>Rule 3.11.5.3</p> <p>Support</p> <p>RETAIN the V1 amendments to Rule 3.11.5.3(5)(a) and (b).</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1469	<p>Rule 3.11.5.3</p> <p>Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8079: [AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan provided <u>approved</u> under Condition 5 may..."</p> <p>AND ADD "<u>Note: For the purpose of Rule 3.11.5.3, any property or enterprise that is</u></p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent

			<p><u>deemed by the Council to be non-compliant shall be considered subject to Rule 3.11.5.6."</u> OR AMEND Rule 3.11.5.3 to be a controlled activity with the matters of control being set out in amended Schedule 2. AND AMEND to ensure the Waikato and Waipā River Iwi are notified of all applications to Waikato Regional Council for Certified Industry Schemes.]</p>	<p>with the specific decisions sought by WPL in its own submissions.</p>
		PC1-8080	<p>Rule 3.11.5.4 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.4 to relist items 4 and 5 to become a and b AND AMEND Matters of Control to read: "Waikato Regional Council... ii. The actions and timeframes for undertaking <u>implementing and putting in place</u> mitigation actions <u>identified in Farm Environment Plan</u> that <u>will</u> maintain <u>identified low levels of</u>, or reduce the diffuse... iii. The actions, timeframes and other... unless other suitable <u>and identified</u> mitigations are... vii. The timeframe and circumstance... Farm Environment Plan shall be amended..."</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-986	<p>Rule 3.11.5.4 Support</p> <p>RETAIN the V1 amendments to Rule 3.11.5.4(1) and(2) AND RETAIN the V1 amendments to Rule 3.11.5.4 Matters of Control.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be</p>

				allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1470	<p>Rule 3.11.5.4 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8080: [AMEND Rule 3.11.5.4 to relist items 4 and 5 to become a and b AND AMEND Matters of Control to read: "Waikato Regional Council...</p> <p>ii. The actions and timeframes for undertaking <u>implementing and putting in place</u> mitigation actions <u>identified in Farm Environment Plan</u> that <u>will maintain identified low levels of</u>, or reduce the diffuse...</p> <p>iii. The actions, timeframes and other... unless other suitable <u>and identified</u> mitigations are...</p> <p>vii. The timeframe and circumstance... Farm Environment Plan shall be amended..."]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-987	<p>Rule 3.11.5.5 Support</p> <p>RETAIN the V1 amendments to Rule 3.11.5.5(5) AND RETAIN the V1 amendments to the Advisory note to Rule 3.11.5.5.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent

				with the specific decisions sought by WPL in its own submissions.
		PC1-8082	Rule 3.11.5.6 Support the provision RETAIN Rule 3.11.5.6.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1445	Rule 3.11.5.6 Support APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8082: [RETAIN Rule 3.11.5.6.]	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-8085	Rule 3.11.5.7 Support the provision RETAIN Rule 3.11.5.7.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1446	Rule 3.11.5.7 Support APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8085: [RETAIN	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own

			Rule 3.11.5.7.]	submissions, and seeks that it should be disallowed.
		PC1-8132	<p>Schedule B Support with amendments</p> <p>AMEND Schedule B to read: "A property or enterprise with a...</p> <p>b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period (specified in clause f)...</p> <p>f. The reference period is an average of the five years between the five financial years spanning 2011/12 to 2015/16 (as consistent with the five year rolling average in 5(a) in Schedule 1) the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable..."</p> <p>AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions:</p> <ul style="list-style-type: none"> • (ADD a third bullet point) <u>Where the farm has verifiable farm operational data that is capable of showing the relative use of various blocks on the farm by different classes of livestock.</u>" <p>ADD to the third Column, the words: "<u>Where verification is possible relative difference should be allowed to be used to encourage smart land use and production systems consistent with Policy 5.</u>"</p> <p>Animal weights, second column, "Only use OVERSEER defaults - do not enter in weights</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>and... (national averages). <u>Except where the farm has verifiable digital data of stock weights at the appropriate times.</u>"</p> <p>Third column, "<u>Accurate animal weights are difficult to obtain and prove but those operators who manage and collect verifiable weights should be able to use them.</u>"</p> <p>Soil description, second column, "<u>For dairy systems Use Soil Order - obtained from S-Map or where S-Map is unavailable from LRI 1:50,000 data or a soil map of the farm. For all other land uses use the best verifiable information available.</u>"</p> <p>ADD to the third column "To ensure consistency between areas... that don't <u>for the purposes of developing the Nitrogen Reference Point 75th percentile.</u>"</p>	
		V1PC1-989	<p>Schedule B Support</p> <p>RETAIN the V1 amendments to Schedule B(e).</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1476	<p>Schedule B Support with amendments</p>	<p>WPL supports and opposes the submission because it</p>

			<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8132: [AMEND Schedule B to read: "A property or enterprise with a...</p> <p>b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period (specified in clause f)...</p> <p>f. The reference period is an average of the five years between <u>the five financial years spanning 2011/12 to 2015/16 (as consistent with the five year rolling average in 5(a) in Schedule 1)</u> the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable..."</p> <p>AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions: • (ADD a third bullet point) <u>Where the farm has verifiable farm operational data that is capable of showing the relative use of various blocks on the farm by different classes of livestock.</u>"</p> <p>ADD to the third Column, the words: "<u>Where verification is possible relative difference should be allowed to be used to encourage smart land use and production systems consistent with Policy 5.</u>"</p> <p>Animal weights, second column, "Only use OVERSEER defaults - do not enter in weights and... (national averages). <u>Except where the farm has verifiable digital data of stock weights at the appropriate times.</u>"</p> <p>Third column, "<u>Accurate animal weights are difficult to obtain and prove but those operators</u></p>	<p>is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p><u>who manage and collect verifiable weights should be able to use them."</u></p> <p>Soil description, second column, "<u>For dairy systems Use Soil Order - obtained from S-Map or where S-Map is unavailable from LRI 1:50,000 data or a soil map of the farm. For all other land uses use the best verifiable information available."</u></p> <p>ADD to the third column "<u>To ensure consistency between areas... that don't for the purposes of developing the Nitrogen Reference Point 75th percentile."]</u></p>	
		PC1-8147	<p>Schedule 1 Support the provision with amendments</p> <p>AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain...</p> <p>1.c. A list of land parcels which...</p> <p>i. the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</p> <p>iii. <u>The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u></p> <p>2. An assessment of the risk of diffuse discharge.. farming activities on the property <u>or enterprise</u>, and the priority of...</p> <p>a. A description of where and how...</p> <p>i. the <u>location and</u> provision of fencing and livestock...</p> <p>ii. for areas with a slope... is impracticable, the <u>location and</u> provision of alternative...</p> <p>c. A description of the critical source areas...</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses from <u>to</u> these areas through...</p> <p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; and</p> <p><u>ii. an assessment of the assumptions used in a nutrient budget for the property and an opinion on material differences.</u></p> <p>f. A description of cultivation management...</p> <p>d. <u>Establishing and</u> maintaining appropriate buffers...</p> <p>3. A spatial risk map(s) at a scale that clearly shows:</p> <p>a. The boundaries of the property <u>or enterprise (if different)</u>; and...</p> <p>4. A <u>detailed</u> description of the <u>following: Mitigation actions, timeframes and other measures to reduce the diffuse discharges of phosphorus, sediment and microbial pathogens that will be undertaken in response to the risks identified in the risk assessment in 2 above (having regard to their relative priority) as well as where the mandatory time-bound actions will be undertaken, and when and to what standard they will be completed.</u></p> <p>5. A <u>detailed</u> description of the following:</p> <p>a. <u>Mitigation</u> actions, timeframes and other...</p> <p>6. A <u>programme of works that sets out:</u></p> <p>a. <u>The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</u></p> <p>i. <u>Record of inspection by Waikato Regional Council staff or;</u></p> <p>ii. <u>Record of inspection by Certified Industry Scheme staff; and</u></p>	
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			<p><u>iii. Record of audit by independent third party accredited auditor.</u></p> <p><u>7. A version control table that sets out the date of any amendment to the Farm Environment Plan and the content of the amendment to the Farm Environment Plan.</u></p> <p><u>8. A declaration from the Certified Farm Environment Planner confirming the best available and most accurate information was use for the promulgation and design of mitigation actions."</u></p>	
		V1PC1-1472	<p>Schedule 1 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8147: [AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain...</p> <p>1.c. A list of land parcels which...</p> <p>i. the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</p> <p><u>iii. The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u></p> <p>2. An assessment of the risk of diffuse discharge.. farming activities on the property <u>or enterprise</u>, and the priority of...</p> <p>a. A description of where and how...</p> <p>i. the <u>location and</u> provision of fencing and livestock...</p> <p>ii. for areas with a slope... is impracticable, the <u>location and</u> provision of alternative...</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p>c. A description of the critical source areas...</p> <p>i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses from <u>to</u> these areas through...</p> <p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; and</p> <p>ii. <u>an assessment of the assumptions used in a nutrient budget for the property and an opinion on material differences.</u></p> <p>f. A description of cultivation management...</p> <p>d. <u>Establishing and</u> maintaining appropriate buffers...</p> <p>3. A spatial risk map(s) at a scale that clearly shows:</p> <p>a. The boundaries of the property <u>or enterprise (if different)</u>; and...</p> <p>4. A <u>detailed</u> description of the <u>following: Mitigation actions, timeframes and other measures to reduce the diffuse discharges of phosphorus, sediment and microbial pathogens that will be undertaken in response to the risks identified in the risk assessment in 2 above (having regard to their relative priority) as well as where the mandatory time-bound actions will be undertaken, and when and to what standard they will be completed.</u></p> <p>5. A <u>detailed</u> description of the following:</p> <p>a. <u>Mitigation actions, timeframes and other...</u></p> <p>6. A programme of works that sets out:</p> <p>a. <u>The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</u></p> <p>i. <u>Record of inspection by Waikato Regional Council staff or;</u></p> <p>ii. <u>Record of inspection by Certified Industry</u></p>	
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			<p><u>Scheme staff; and</u></p> <p><u>iii. Record of audit by independent third party accredited auditor.</u></p> <p><u>7. A version control table that sets out the date of any amendment to the Farm Environment Plan and the content of the amendment to the Farm Environment Plan.</u></p> <p><u>8. A declaration from the Certified Farm Environment Planner confirming the best available and most accurate information was use for the promulgation and design of mitigation actions."]</u></p>	
		PC1-7491	<p>Table 3.11-1 Support the provision with amendments</p> <p>DELETE from Table 3.11-1 the 80-year numerical targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment.</p> <p>AND review the 10-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is proportionate to the amount of current discharge.</p> <p>AND RETAIN the 80-year numerical targets for E.coli and water clarity for the Waikato River main stem and sub- catchments.</p> <p>AND RETAIN the 80-year numerical targets for Chlorophyll a for the Waikato River main stem only.</p> <p>AND RETAIN the 10-year Total Nitrogen and Total Phosphorous targets for the Waikato River main stem.</p> <p>AND AMEND the 80-year Total Nitrogen and Total Phosphorous targets to a single point at the</p>	Oppose

			bottom of each Freshwater Management Unit.	
		V1PC1-963	<p>Table 3.11-1</p> <p>AMEND Table 3.11-1 to remove the 80-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment.</p> <p>AND REVIEW the 10-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen within Table 3.11-1, to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is proportionate to the amount of current discharge (eg those discharging more are expected to make greater reductions) AND AMEND the 80-year numerical attribute targets for N (including total-nitrogen (TN), nitrate-nitrogen and ammoniacal-nitrogen) so that targets are expressed as a single set of TN numerical attribute targets, as measured in the main stem of the Waikato River at the bottom of each Freshwater Management Unit.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-964	<p>Table 3.11-1</p> <p>Support</p> <p>RETAIN in Table 3.11-1, the 80-year numerical attribute targets for E.coli and water clarity for the Waikato River main stem and sub-catchments</p> <p>AND RETAIN the 80-year numerical attribute targets for Chlorophyll a for the Waikato River main stem and sub-catchments.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific</p>

				decisions sought by WPL in its own submissions.
		V1PC1-965	<p>Table 3.11-1 Support with amendments</p> <p>RETAIN in Table 3.11-1 in respect of total nitrogen (TN) and total phosphorus (TP), the 10-year TN and TP numerical attribute targets for the Waikato River main stem. AND AMEND in Table 3.11-1 in respect of TN and TP, the 80-year TN and TP numerical attribute targets to a single point at the bottom of each Freshwater Management Unit.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1449	<p>Table 3.11-1 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-7491: [DELETE from Table 3.11-1 the 80-year numerical targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment. AND review the 10-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is proportionate to the amount of current discharge. AND RETAIN the 80-year numerical targets for E.coli and water clarity for the Waikato River</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>main stem and sub- catchments. AND RETAIN the 80-year numerical targets for Chlorophyll a for the Waikato River main stem only. AND RETAIN the 10-year Total Nitrogen and Total Phosphorous targets for the Waikato River main stem. AND AMEND the 80-year Total Nitrogen and Total Phosphorous targets to a single point at the bottom of each Freshwater Management Unit.]</p>	
		PC1-8173	<p>Enterprise definition Support the provision with amendments</p> <p>AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses</u>, and constitutes a single..."</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1474	<p>Enterprise definition Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-8173: [AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses</u>, and constitutes a single..."]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this</p>

				would be consistent with the specific decisions sought by WPL in its own submissions.
The Royal Forest and Bird Protection Society of New Zealand Incorporated	74122	PC1-8218	Objective 1 Support the provision with amendments AMEND Objective 1 to read: "Objective 1: <u>The restoration and protection of water quality to achieve healthy rivers by 2050</u> Long-term restoration and protection of water quality for each subcatchment and Freshwater Management Unit " AND RETAIN the explanation.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-8220	Objective 2 Support the provision with amendments AMEND Objective 2 to read: "Objective 2: <u>The restoration, protection and enhancement of water quality contributes to social, economic and cultural well-being</u> Social, economic and cultural wellbeing is maintained in the long term"	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-8221	Objective 3 Support the provision with amendments AMEND Objective 3 to read: "Objective 3: <u>Immediate improvements are achieved in water quality in each sub-catchment and Freshwater Management Unit</u> Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit"	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent

			<p>AND AMEND the explanation to read: "Actions are put in place and implemented by 2026 <u>immediately</u> to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, are sufficient to achieve ten percent of the required change between 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"</p>	<p>with the specific decisions sought by WPL in its own submissions.</p>
		PC1-8257	<p>Policy 5 Oppose the provision with amendments</p> <p>AMEND Policy 5 to read: "Recognise that achieving the water quality attribute targets set out in Table 3.11-1 will need to be staged over 80 years to minimise social disruption and allow for innovation and new practices to develop, while making a start on reducing discharges of nitrogen, phosphorus, sediment and microbial pathogens, and preparing for further reductions that will be required in subsequent regional plans 35 years, requiring reductions immediately, and additional reduction in the medium <u>to long term where these are necessary to achieve the targets.</u>"</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-8258	<p>Policy 6</p>	<p>WPL supports and</p>

			<p>Oppose the provision with amendments</p> <p>AMEND Policy 6 to read: "Except as provided for in Policy 16, 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 only be [granted] in exceptional circumstances. Land use change consent applications that demonstrate clear and enduring provide for decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens that will ensure that the water quality targets set out in Table [3].11-1 will generally be granted."</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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Waikato Dairy Leaders Group	74049	PC1-10908	<p>Objective 1 Support the provision</p> <p>RETAIN intent of Objective 1 as set out in "Reasons for adopting Objective 1".</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-10909	<p>Objective 3 Support the provision with amendments</p> <p>RETAIN the intent of Objective 3 as set out in "Reasons for adopting Objective 3" AND RETAIN the Objective 3 statement: 'Actions put in place and implemented by 2026 to reduce discharges of nitrogen, phosphorus, sediment</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the</p>

			and microbial pathogens, are sufficient to achieve ten percent of the required change between current water quality and the 80 year water quality attribute^ <u>targets</u> ^ in Table 3.11-1'.	submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10926	Objective 4 Support the provision with amendments RETAIN the intent of Objective 4 as set out in 'Reasons for adopting Objective 4'.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-11011	Policy 6 Support the provision with amendments RETAIN Policy 6 guidance for Non-Complying consent applications to increase discharges leaving a property.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10944	Policy 7 Support the provision with amendments RETAIN the provisions of PPC1 that are proactive in anticipating the sorts of information needed to reduce contaminant reductions and achieve Objective 1 AND AMEND Policy 7 to read: " <u>Identify and fill information gaps</u> to prepare for further diffuse discharge reductions and any future property or enterprise-level allocation	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent

			<p><u>limits</u> of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will <u>may</u> be required by subsequent regional plans, by implementing the policies and methods in this chapter. To ensure this occurs, <u>research will be undertaken in partnership with technical and industry organisations in a manner that allows people and communities to understand the social, environmental, cultural and economic implications of the current plan, and engage in debate about any future limits.</u> collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'."</p> <p>AND RETAIN wording in PPC1 that subsequent plan changes will be subject to the full public process of the RMA First Schedule, and will enable all those within the Waipā and Waikato River catchments to fully participate.</p>	with the specific decisions sought by WPL in its own submissions.
		PC1-11009	<p>Method 3.11.4.7 Support the provision with amendments</p> <p>AMEND Method 3.11.4.7 to set out a programme of work to provide an accurate assessment of all sources that contribute to the load of contaminant from the land and to track changes in diffuse and point source discharges as a result of actions required by PPC1.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent

				with the specific decisions sought by WPL in its own submissions.
		PC1-11010	<p>Method 3.11.4.8 Support the provision with amendments</p> <p>AMEND Method 3.11.4.8 to set out a programme of work to provide an accurate assessment of all sources that contribute to the load of contaminant from the land and to track changes in diffuse and point source discharges as a result of actions required by PPC1 AND AMEND to require an analysis of frameworks to manage both point source and diffuse discharges of contaminants.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-11026	<p>Rule 3.11.5.3 Support the provision</p> <p>RETAIN the Permitted Activity status of Rule 3.11.5.3 AND RETAIN the intent to require a Farm Environment Plan that is tailored to each individual farm, from farmers who have signed up to a Certified Industry Scheme AND AMEND to ensure Rule 3.11.5.3 has the same rigour of requirements as Rule 3.11.5.4, including the development, monitoring and enforcement of the Farm Environment Plan.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-11028	<p>Rule 3.11.5.4 Support the provision</p>	WPL supports and opposes the

			<p>RETAIN the Rule 3.11.5.4 Controlled Activity status where farmers are assured of gaining consent, which will be subject to appropriate conditions</p> <p>AND RETAIN the intent to require a Farm Environment Plan that is tailored to each individual farm</p> <p>AND AMEND to ensure Rule 3.11.5.4 has the same rigour of requirements as Rule 3.11.5.3, including the development, monitoring and enforcement of the Farm Environment Plan.</p>	<p>submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-11269	<p>Schedule B</p> <p>Support the provision</p> <p>RETAIN the Schedule B requirement for properties and enterprises over 20 hectares to calculate a Nitrogen Reference Point.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
Waikato District Council (WDC)	73418	PC1-3125	<p>Rule 3.11.5.5</p> <p>No specific decision sought for Rule 3.11.5.5.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-3118	<p>Rule 3.11.5.7</p> <p>Support the provision with amendments</p> <p>AMEND Rule 3.11.5.7 with options below (or similar)</p>	<p>WPL supports the submission because it is generally consistent with the decisions sought by WPL, and</p>

			<p>"is a permitted activity where <u>a) an environmental farm plan is in place, and amendments are undertaken to the plan to encompass the changes in land use by a Certified Farm Environment Planner.</u> <u>b) Waikato Regional Council are notified 30 days prior to the land use change being initiated.</u> <u>Or otherwise is a restricted discretionary non-complying</u> "activity" (requiring resource consent)"</p>	<p>seeks that it should be allowed.</p>
		PC1-3119	<p>Schedule B Support the provision with amendments</p> <p>REVIEW AND AMEND all relevant PPC1 provisions to: AMEND Schedule B to ensure it is explicit about how the Nitrogen Reference Point is to be used in rules applying for the first decade, and how it could be applied in future decades (additional Healthy River plan changes); AND CONSIDER the introduction of Nitrogen Emission Constraint (NEC) methodology as part of future plan changes at least, and; AND AMEND to provide greater clarity and alignment between statements concerning Nitrogen Reference Point in the rules and Schedule 1. The reason for this is the expectation is that Nitrogen Reference Point will increase in importance through time under Healthy Rivers plan changes (i.e. further reductions required), therefore it is important to get clarity now. AND AMEND Schedule B(c), with the following, or wording with a similar intention: "The Nitrogen Reference Point must be calculated using the current version of the OVERSEER Model</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			(or any other model approved by the Chief Executive of the Waikato Regional Council). <u>OVERSEER results can be adjusted where there are scientific reasons to believe the model is over or underestimating nitrogen emissions.</u> "	
		PC1-3122	<p>Schedule 1 Support the provision with amendments</p> <p>REVIEW AND AMEND all relevant PPC1 provisions to: AMEND Schedule B to ensure it is explicit about how the Nitrogen Reference Point is to be used in rules applying for the first decade, and how it could be applied in future decades (additional Healthy River plan changes); AND CONSIDER the introduction of Nitrogen Emission Constraint (NEC) methodology as part of future plan changes at least, and; AND AMEND to provide greater clarity and alignment between statements concerning Nitrogen Reference Point in the rules and Schedule 1. The reason for this is the expectation is that Nitrogen Reference Point will increase in importance through time under Healthy Rivers plan changes (i.e. further reductions required), therefore it is important to get clarity now.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
Waikato Regional Council	72890	PC1-2985	<p>Objective 1 Support the provision</p> <p>RETAIN Objective 1 AND AMEND Objective 1 to acknowledge climate change as required by the NPSFM.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the

				submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1479	Objective 1 Support APPLY decision requested in accordance with the submitter's PPC1 submission PC1-2985: [RETAIN Objective 1 AND AMEND Objective 1 to acknowledge climate change as required by the NPSFM.]	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-2991	Objective 3 Support the provision RETAIN Objective 3.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1481	Objective 3 Support APPLY decision requested in accordance with the	WPL opposes the submission because it is not consistent with the decisions sought by

			submitter's PPC1 submission PC1-2991: [RETAIN Objective 3.]	WPL in its own submissions, and seeks that it should be disallowed.
		PC1-2992	Objective 4 Support the provision RETAIN Objective 4.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1482	Objective 4 Support APPLY decision requested in accordance with the submitter's PPC1 submission PC1-2992: [RETAIN Objective 4.]	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-2996	Policy 1 Support the provision RETAIN Policy 1.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1484	Policy 1 Support APPLY decision requested in accordance with the submitter's PPC1 submission PC1-2996: [RETAIN	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own

			Policy 1.]	submissions, and seeks that it should be disallowed.
		PC1-3002	Policy 4 Support the provision RETAIN Policy 4.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1486	Policy 4 Support APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3002: [RETAIN Policy 4.]	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-3005	Policy 6 Support the provision with amendments AMEND Policy 6 to read: "Except as provided for in Policy 16, land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens compared with what was occurring at 22 October 2016, will generally not be granted. Land use change consent applications that demonstrate clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens compared with what was occurring at 22 October	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<u>2016, will generally be granted."</u>	
		V1PC1-1503	<p>Policy 6 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3005: [AMEND Policy 6 to read: "Except as provided for in Policy 16, land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens <u>compared with what was occurring at 22 October 2016, will generally not be granted.</u> Land use change consent applications that demonstrate clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>compared with what was occurring at 22 October 2016, will generally be granted."</u>]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-3006	<p>Policy 7 Support the provision</p> <p>RETAIN Policy 7.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1488	<p>Policy 7 Support</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3006: [RETAIN Policy 7.]</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.

		PC1-3111	<p>Method 3.11.4.8 Support the provision with amendments</p> <p>AMEND Method 3.11.4.8 (b) to read: "Use this to inform future changes... to meet the <u>water quality attribute</u> ^ targets^ in <u>Table 3.11-1</u> the <u>Objectives</u>"</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1512	<p>Method 3.11.4.8 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3111: [AMEND Method 3.11.4.8 (b) to read: "Use this to inform future changes... to meet the <u>water quality attribute</u> ^ targets^ in <u>Table 3.11-1</u> the <u>Objectives</u>"]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-3117	<p>Rule 3.11.5.2 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.2 to ensure that the</p>	<p>WPL supports and opposes the submission because it is generally consistent</p>

			<p>registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1</p> <p>AND AMEND Rule 3.11.5.2 (2) to read: "Cattle, horses, deer and pigs are excluded from water bodies in conformance <u>The use of land for farming activities complies</u> with schedule C and Conditions 3(e) and 4(e) of this rule; and"</p> <p>AND AMEND Rule 3.11.5.2 (3) (a) to read: "The farming activities do not form part of an enterprise being undertaken on more than one property <u>(unless the enterprise has a total area of less than or equal to 20 hectares)</u>; and"</p> <p>AND AMEND Rule 3.11.5.2(4)(b)(ii) so that the reference to the nitrogen threshold (15 kgN/ha/yr) is deleted and replaced with a suitable land use intensity proxy</p> <p>AND AMEND Rule 3.11.5.2 (3)(b)(i) to read "...used for grazing livestock, the annual stocking rate of the land is no greater than the stocking rate of the land at <u>in the 12 months prior to 22 October 2016. Where the land was not used for livestock grazing in the 12 months prior to 22 October 2016 the land use shall have the same or lower diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens as the land use at 22 October 2016;</u> or"</p> <p>AND AMEND Rule 3.11.5.2(e) to clarify that the measurement for calculating the distance requirements for fencing are based on horizontal distances</p> <p>AND AMEND Rule 3.11.5.2 (5) to read: "For all properties greater than 4.1 hectares, from 31 March 2019, in addition to the requirements of Schedule A, the following information must be provided on request to the Waikato Regional Council by 1 September each year:"</p>	<p>with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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		V1PC1-187	<p>Rule 3.11.5.2 Support</p> <p>RETAIN the amended dates within Rule 3.11.5.2(5) as notified.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		V1PC1-1514	<p>Rule 3.11.5.2 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3117: [AMEND Rule 3.11.5.2 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1 AND AMEND Rule 3.11.5.2 (2) to read: "Cattle, horses, deer and pigs are excluded from water bodies in conformance <u>The use of land for farming activities complies</u> with schedule C and Conditions 3(e) and 4(e) of this rule; and" AND AMEND Rule 3.11.5.2 (3) (a) to read: "The farming activities do not form part of an enterprise being undertaken on more than one property <u>(unless the enterprise has a total area of less than or equal to 20 hectares)</u>; and" AND AMEND Rule 3.11.5.2(4)(b)(ii) so that the reference to the nitrogen threshold (15 kgN/ha/yr) is deleted and replaced with a suitable land use intensity proxy AND AMEND Rule 3.11.5.2 (3)(b)(i) to read "...used for grazing livestock, the annual stocking rate of the land is no greater than the stocking rate of the land at <u>in the 12 months prior to 22</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>October 2016. Where the land was not used for livestock grazing in the 12 months prior to 22 October 2016 the land use shall have the same or lower diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens as the land use at 22 October 2016; or"</u> AND AMEND Rule 3.11.5.2(e) to clarify that the measurement for calculating the distance requirements for fencing are based on horizontal distances AND AMEND Rule 3.11.5.2 (5) to read: "For all properties greater than 4.1 hectares, from 31 March 2019, in addition to the requirements of Schedule A, the following information must be provided on request to the Waikato Regional Council by 1 September each year.""]</p>	
		PC1-3417	<p>Rule 3.11.5.3 Support the provision with amendments</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. 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 with <u>shall comply</u> with Schedule C;" AND AMEND Rule 3.11.5.3 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>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-189	<p>Rule 3.11.5.3 Support</p>	<p>WPL opposes the submission because it</p>

			RETAIN the amended dates within Rule 3.11.5.3(5) as notified.	is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1515	<p>Rule 3.11.5.3 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3417: [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. AND AMEND Rule 3.11.5.3(3) to read: "<u>The use of land for farming activities cattle, horses, deer and pigs are excluded from water bodies in conformance with shall comply</u> with Schedule C;" AND AMEND Rule 3.11.5.3 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>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-3420	<p>Rule 3.11.5.4 Support the provision with amendments</p> <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 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</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this

			<p>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 nitrogen being lost from a property</p> <p>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."</p> <p>OR alternatively</p> <p>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</p> <p>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</p> <p>AND AMEND to require compliance with Schedule B</p> <p>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</p> <p>AND AMEND Rule 3.11.5.4 to provide for a more refined staging of resource consent applications over each of the three year period in each priority order but remain with the priority order</p>	<p>would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p>in Table 3.11-2 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 <u>comply</u> with Schedule B and is <u>has been</u> provided to the Waikato Regional Council at the time the resource consent application is lodged..." AND AMEND Rule 3.11.5.4(4) to add a new item to read: "<u>The use of land for farming activities complies with Schedule C.</u>" 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." 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>	
		V1PC1-190	<p>Rule 3.11.5.4 Support</p> <p>RETAIN the amended dates within Rule 3.11.5.4 as notified.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		V1PC1-1516	<p>Rule 3.11.5.4 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3420: [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 AND AMEND Rule 3.11.5.4 to include a specific</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this</p>

			<p>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 nitrogen being lost from a property</p> <p>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."</p> <p>OR alternatively</p> <p>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</p> <p>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</p> <p>AND AMEND to require compliance with Schedule B</p> <p>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</p> <p>AND AMEND Rule 3.11.5.4 to provide for a more refined staging of resource consent applications</p>	<p>would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p>over each of the three year period in each priority order but remain with the priority order in Table 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 <u>comply</u> 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 complies with Schedule C.</u>"</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>	
		PC1-3444	<p>Rule 3.11.5.5 Support the provision with amendments</p> <p>AMEND Rule 3.11.5.5 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 3.11.5.5 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 Rule 3.11.5.5 to resolve the practical implementation challenges in the rule, including: • the ownership of the Nitrogen Reference Point (property or enterprise)</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<ul style="list-style-type: none"> • how the Nitrogen Reference Point concept can accommodate land which comes into or is taken out a commercial vegetable production enterprise. <p>AND AMEND Rule 3.11.5.5 to provide for the rotation of crops within commercial vegetable production prior to 2020 as a permitted activity.</p> <p>AND AMEND Rule 3.11.5.5 to read: "<u>Permitted and Controlled Activity Rule – Existing commercial vegetable production.</u></p> <p>The use of land for commercial vegetable production 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 until 1 January 2020, <u>subject to conditions.</u></p> <p><u>From 1 January 2020 from which date it the use of land for commercial vegetable production 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,</u> shall be a controlled activity (requiring resource consent) subject to the following standards and terms <u>conditions.</u></p> <p><u>Rule 3.11.5.5 Conditions for permitted and controlled activity:</u></p> <ol style="list-style-type: none"> a. The property is registered with the Waikato Regional Council in conformance with Schedule A; and b. A Nitrogen Reference Point is produced for the property or enterprise in conformance with <u>to comply</u> with Schedule B... c. ... d. ... e. ... 	
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			<p><u>Rule 3.11.5.5 Additional Conditions for controlled activity:</u> f. ... g... h. ...”</p> <p>AND AMEND Rule 3.11.5.5(c) to read: “The use of land for farming activities cattle, horses, deer and pigs are excluded from water bodies in conformance with <u>complies</u> with Schedule C.”</p> <p>AND AMEND Rule 3.11.5.5 (e) to read: “The areas of land, and their locations broken down by sub- catchments..., used for commercial vegetable production <u>in any single financial year</u> within that period, shall be provided to the Council; and”</p> <p>AND AMEND Rule 3.11.5.5(g) to read: “Where new land is proposed to be used , that has not previously been used for commercial vegetable production, an equivalent area of land <u>within the same sub-catchment</u> must be removed from commercial vegetable production...”</p> <p>AND AMEND Rule 3.11.5.5 to remove the ability for an enterprise to hold a Nitrogen Reference Point and restrict the Nitrogen Reference Point to exist only with a particular parcel of land.</p>	
		V1PC1-191	<p>Rule 3.11.5.5 Support</p> <p>RETAIN the amended dates within Rule 3.11.5.5 as notified.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		V1PC1-1517	<p>Rule 3.11.5.5 Support with amendments</p>	<p>WPL supports and opposes the</p>

			<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3444: [AMEND Rule 3.11.5.5 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1. AND AMEND Rule 3.11.5.5 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. AND AMEND Rule 3.11.5.5 to resolve the practical implementation challenges in the rule, including: <ul style="list-style-type: none"> • the ownership of the Nitrogen Reference Point (property or enterprise) • how the Nitrogen Reference Point concept can accommodate land which comes into or is taken out a commercial vegetable production enterprise. AND AMEND Rule 3.11.5.5 to provide for the rotation of crops within commercial vegetable production prior to 2020 as a permitted activity. AND AMEND Rule 3.11.5.5 to read: "<u>Permitted and</u> Controlled Activity Rule – Existing commercial vegetable production. The use of land for commercial vegetable production 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 until 1 January 2020, <u>subject to conditions.</u> <u>From 1 January 2020 from which date it the use of land for commercial vegetable production and the associated diffuse discharge of nitrogen,</u></p>	<p>submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			<p><u>phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water,</u> shall be a controlled activity (requiring resource consent) subject to the following standards and terms conditions.</p> <p><u>Rule 3.11.5.5 Conditions for permitted and controlled activity:</u></p> <p>a. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</p> <p>b. A Nitrogen Reference Point is produced for the property or enterprise in conformance with <u>to comply</u> with Schedule B...</p> <p>c. ...</p> <p>d. ...</p> <p>e. ...</p> <p><u>Rule 3.11.5.5 Additional Conditions for controlled activity:</u></p> <p>f. ...</p> <p>g...</p> <p>h. ..."</p> <p>AND AMEND Rule 3.11.5.5(c) 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 3.11.5.5 (e) to read: "The areas of land, and their locations broken down by sub- catchments..., used for commercial vegetable production <u>in any single financial year</u> within that period, shall be provided to the Council; and"</p> <p>AND AMEND Rule 3.11.5.5(g) to read: "Where new land is proposed to be used , that has not previously been used for commercial vegetable production, an equivalent area of land <u>within the same sub-catchment</u> must be removed from</p>	
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			commercial vegetable production..." AND AMEND Rule 3.11.5.5 to remove the ability for an enterprise to hold a Nitrogen Reference Point and restrict the Nitrogen Reference Point to exist only with a particular parcel of land.]	
		PC1-3477	Rule 3.11.5.6 Support the provision with amendments AMEND Rule 3.11.5.6 by adding a new matter over which Council reserves its discretion to read: " <u>viii. Consistency with the Objectives and Policies of the Waikato Regional Plan or proposed regional plan.</u> "	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1518	Rule 3.11.5.6 Support with amendments APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3477: [AMEND Rule 3.11.5.6 by adding a new matter over which Council reserves its discretion to read: " <u>viii. Consistency with the Objectives and Policies of the Waikato Regional Plan or proposed regional plan.</u> "]	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

		PC1-3480	<p>Rule 3.11.5.7 Support the provision with amendments</p> <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..." 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 dairy farming <u>land use, except for commercial vegetable production to dairy farming:</u>" AND DELETE Rule 3.11.5.7(3) in its entirety.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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		V1PC1-1519	<p>Rule 3.11.5.7 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3480: [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..." 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</u> use... property or enterprise <u>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 dairy farming <u>land use, except for commercial vegetable production</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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			to dairy farming:" AND DELETE Rule 3.11.5.7(3) in its entirety.]	
		PC1-3553	<p>Schedule B Support the provision</p> <p>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.</p> <p>AND AMEND to clarify whether it is the current, intended, or previous land use that determines the appropriate nitrogen reference period to use.</p> <p>AND AMEND clause a. to read: "The Nitrogen Reference Point must be calculated <u>approved</u> by a Certified Farm Nutrient Advisor..."</p> <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</u> year (being 12 consecutive months) 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 2016 <u>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</u> Reference Period is the two... except <u>where the primary land use is</u> for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016 <u>or such lesser, relevant period if the land was used for commercial vegetable production during only part of that period.</u>"</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>AND AMEND Schedule B clause g. to read: "...</p> <p>i. Stock numbers as recorded in annual accounts together with stock sale and purchase 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;</u> and</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> <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</u></p>	
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			<p><u>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: <u>"...with the 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>	
		V1PC1-195	<p>Schedule B Support with amendments</p> <p>RETAIN the amended dates within Schedule B as notified AND AMEND the NRP reference period in Schedule B.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		V1PC1-218	<p>Schedule B Support with amendments</p> <p>AMEND Schedule B(d) to reference the OVERSEER Model as the default model to be used to provide a NRP AND AMEND Schedule B(d) to accommodate changes to the Overseer business model and Overseer data being held on- line.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

		V1PC1-222	<p>Schedule B Support with amendments</p> <p>PROVIDE a provision within Schedule B that enables the Council to amend an NRP where it is appropriate to do so.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		V1PC1-229	<p>Schedule B Oppose with amendments</p> <p>AMEND Table 1 in Schedule B, to specify the use of SMAP (Soil Map) functionality instead of Soil Order.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1494	<p>Schedule B Support</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission 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,</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent</p>

			<p>intended, or previous land use that determines the appropriate nitrogen reference period to use.</p> <p>AND AMEND clause a. to read: "The Nitrogen Reference Point must be calculated <u>approved</u> by a Certified Farm Nutrient Advisor..."</p> <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</u> year (being 12 consecutive months) 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 2016 <u>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 where the primary land use is for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016 <u>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. Stock numbers as recorded in annual accounts together with stock sale and purchase 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</u></p>	<p>with the specific decisions sought by WPL in its own submissions.</p>
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			<p><u>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 mm/ha/month per irrigated block, and proof of <u>areas irrigated (for Overseer® block setup);</u></p> <p>vi. <u>Records of crops grown on the land and grazed including area and yield, and including cultivation and sowing records where available;</u> and</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> <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: "<u>...with the 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>	
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		V1PC1-203	<p>Schedule 1 Support the provision with amendments</p> <p>AMEND Schedule 1 to provide further guidance for timeframes associated with identified mitigation actions.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-3575	<p>Schedule 1 Support the provision with amendments</p> <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 B use protocols</u> , or using any other model or method approved"</p> <p>AND AMEND Schedule 1: Vegetable growing minimum standards Row 5 of the table Soil/Phosphorus to read: "As a minimum by block: an approved erosion and sediment control plan constructed <u>compiled by the Certified Farm</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<p><u>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>	
		V1PC1-1522	<p>Schedule 1 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3575: [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 B use protocols</u> , or using any other model or method approved"</p> <p>AND AMEND Schedule 1: Vegetable growing minimum standards Row 5 of the table 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:</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			"Actions, timeframes and other measures.... or enterprise's Nitrogen Reference Point unless other suitable mitigations are specified. " 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.]	
		PC1-12544	Schedule 1 Support the provision with amendments AMEND Schedule 1 to simplify the numbering AND AMEND to reflect the standards/terms/conditions in the rules OR DELETE the references to some of the minimum standards in Schedule 1 OR AMEND to reflect the standards as 'best management practice' recommendations rather than firm requirements AND AMEND to renumber Schedule 1 clause "2(f)(ii)(e)" to clause "2(g)" AND AMEND to renumber clause "2(f)(ii)(f)" to clause "2(h)" 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..." AND AMEND Schedule 1 clause 2(b)(ii) to read: "Where practicable the provision... for land with a slope of less than 15°..."	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1537	Schedule 1 Support with amendments APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12544: [AMEND Schedule 1 to simplify the numbering	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its

			<p>AND AMEND to reflect the standards/terms/conditions in the rules OR DELETE the references to some of the minimum standards in Schedule 1 OR AMEND to reflect the standards as 'best management practice' recommendations rather than firm requirements AND AMEND to renumber Schedule 1 clause "2(f)(ii)(e)" to clause "2(g)" AND AMEND to renumber clause "2(f)(ii)(f)" to clause "2(h)" 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..." AND AMEND Schedule 1 clause 2(b)(ii) to read: "Where practicable the provision... for land with a slope of less than 15°...""]</p>	<p>own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-12545	<p>Schedule 1 Support the provision with amendments</p> <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" 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>)." 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</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			<u>compliance with conditions (a) to (f) of rule 3.4.5.6 of the Waikato Regional Plan.</u> "	
		V1PC1-1538	<p>Schedule 1 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12545: [AMEND Schedule 1 clause 2(f)(i) to read: "The identification of slopes over... from that cultivation can be avoided <u>minimised</u>; and" 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>)." 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>"]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-3635	<p>Table 3.11-1 Support the provision with amendments</p> <p>AMEND Table 3.11-1: Dune, Riverine, Volcanic and Peat Lakes freshwater Management Units on page 67, by adding two new columns to provide targets for Annual Median and Annual Maximum Ammonia as per NPSFM - Band C for 80 year target AND AMEND Table 3.11-1 by adding a footnote to read: "<u>that the annual median and annual maximum ammonia have been adjusted for pH.</u>"</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific

			<p>AND AMEND either the Methods or Table 3.11-1 Explanatory note to Table 3.11-1 to get alignment between the attribute Clarity in Table 3.11-1 and references to sediment in the Methods</p> <p>AND AMEND Table 3.11-1 to combine the three tables into one table, OR provide different captions and individual numbering for each table</p> <p>AND AMEND to place the table caption directly above the table</p> <p>AND AMEND Table 3.11-1 to read: "Waerenga Stm SH2 Maramarua Taniwha Rd."</p> <p>AND AMEND to rename Lake Opouri as Lake Ngapouri in Table 3.11-1 Dune, Riverine, Volcanic and Peat Lakes Freshwater Management Units (last section, on page 67, list the names of the lakes and their catchments, as is the case for all other entries in the table</p> <p>AND AMEND Table 3.11-1 to take into account the Bay of Plenty Regional Council water quality standards for those parts of the Waikato and Waipā River Catchment area that overlap with and drain into the Lake Rotorua Catchment AND AMEND to rename the Volcanic Lake category in a way that is relevant to some aspect of the character of the lakes in the category.</p>	<p>decisions sought by WPL in its own submissions.</p>
		V1PC1-1523	<p>Table 3.11-1 Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3635: [AMEND Table 3.11-1: Dune, Riverine, Volcanic and Peat Lakes freshwater Management Units on page 67, by adding two new columns to provide targets for Annual Median and Annual Maximum Ammonia as per NPSFM - Band C for 80 year</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this</p>

			<p>target AND AMEND Table 3.11-1 by adding a footnote to read: "<u>that the annual median and annual maximum ammonia have been adjusted for pH.</u>" AND AMEND either the Methods or Table 3.11-1 Explanatory note to Table 3.11-1 to get alignment between the attribute Clarity in Table 3.11-1 and references to sediment in the Methods AND AMEND Table 3.11-1 to combine the three tables into one table, OR provide different captions and individual numbering for each table AND AMEND to place the table caption directly above the table AND AMEND Table 3.11-1 to read: "Waerenga Stm SH2 Maramarua <u>Taniwha Rd.</u>" AND AMEND to rename Lake Opouri as Lake Ngapouri in Table 3.11-1 Dune, Riverine, Volcanic and Peat Lakes Freshwater Management Units (last section, on page 67, list the names of the lakes and their catchments, as is the case for all other entries in the table AND AMEND Table 3.11-1 to take into account the Bay of Plenty Regional Council water quality standards for those parts of the Waikato and Waipā River Catchment area that overlap with and drain into the Lake Rotorua Catchment AND AMEND to rename the Volcanic Lake category in a way that is relevant to some aspect of the character of the lakes in the category.]</p>	<p>would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-3666	<p>Glossary of Terms Support the provision with amendments ADD a NEW definition to the Glossary of Terms to read "<u>Current version of OVERSEER® is the version of the Overseer® Model with the most</u></p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its</p>

			<p><u>recent release date.</u>"</p> <p>AND ADD to the Glossary of Terms a new definition for Nitrogen Reference Period to read: "<u>...is a property's or enterprise's 2014/15 and 2015/16 financial years, except for properties or enterprises where the principle land use is commercial vegetable production, in which case the nitrogen reference period is the period commencing with the property's or enterprise's 2006/7 financial year and ending with its 2015/16 financial year.</u>"</p> <p>AND ADD to the Glossary of Terms a new definition for Nitrogen Reference Period Data to read: "<u>is the set of verified OVERSEER input parameters for each of the financial years of the nitrogen reference period.</u>"</p> <p>AND ADD to the Glossary of Terms a new definition for Nitrogen Reference Point Data to read: "<u>is the verified Overseer input parameters for the single financial year of the nitrogen reference period that when modelled in the version of Overseer current at 1 April 2019 results in the highest nitrogen leaching rate.</u>"</p> <p>AND ADD to the Glossary of Terms in Chapter 3.11 a specific definition for urban properties. AND ADD a NEW definition to the Glossary of Terms for Wetland to read: "For the purposes of Chapter 3.11 includes permanently or intermittently wet areas, shallow water, and land water margins that support a natural ecosystem of plants and animals that are adapted to wet conditions."</p>	<p>own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1528	<p>Glossary of Terms Support with amendments</p> <p>APPLY decision requested in accordance with the</p>	<p>WPL supports and opposes the submission because it is generally consistent</p>

			<p>submitter's PPC1 submission PC1-3666: [ADD a NEW definition to the Glossary of Terms to read "<u>Current version of OVERSEER® is the version of the Overseer® Model with the most recent release date.</u>"</p> <p>AND ADD to the Glossary of Terms a new definition for Nitrogen Reference Period to read: "<u>...is a property's or enterprise's 2014/15 and 2015/16 financial years, except for properties or enterprises where the principle land use is commercial vegetable production, in which case the nitrogen reference period is the period commencing with the property's or enterprise's 2006/7 financial year and ending with its 2015/16 financial year.</u>"</p> <p>AND ADD to the Glossary of Terms a new definition for Nitrogen Reference Period Data to read: "<u>is the set of verified OVERSEER input parameters for each of the financial years of the nitrogen reference period.</u>"</p> <p>AND ADD to the Glossary of Terms a new definition for Nitrogen Reference Point Data to read: "<u>is the verified Overseer input parameters for the single financial year of the nitrogen reference period that when modelled in the version of Overseer current at 1 April 2019 results in the highest nitrogen leaching rate.</u>"</p> <p>AND ADD to the Glossary of Terms in Chapter 3.11 a specific definition for urban properties. AND ADD a NEW definition to the Glossary of Terms for Wetland to read: "For the purposes of Chapter 3.11 includes permanently or intermittently wet areas, shallow water, and land water margins that support a natural ecosystem of plants and animals that are adapted to wet conditions."]</p>	<p>with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
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		PC1-3664	<p>75th percentile nitrogen leaching value definition Support the provision with amendments</p> <p>AMEND the Glossary definition of 75th percentile nitrogen leaching value to clarify the method for calculating the 75th percentile. AND AMEND to include in the definition that this calculation will be undertaken once at a single point in time. AND AMEND the Glossary definition of 75th percentile nitrogen leaching value to clarify that a 75th percentile nitrogen leaching value will only be established for each of the four riverine Freshwater Management Units, and will apply to any lake catchments within each riverine Freshwater Management Unit.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1526	<p>75th percentile nitrogen leaching value definition Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3664: [AMEND the Glossary definition of 75th percentile nitrogen leaching value to clarify the method for calculating the 75th percentile. AND AMEND to include in the definition that this calculation will be undertaken once at a single point in time. AND AMEND the Glossary definition of 75th percentile nitrogen leaching value to clarify that a 75th percentile nitrogen leaching value will only be established for each of the four riverine Freshwater Management Units, and will apply to any lake catchments within each riverine Freshwater Management Unit.]</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-3671	Enterprise definition	WPL supports and

			<p>Support the provision with amendments</p> <p>AMEND the Glossary definition of Enterprise to clarify the scope and nature of an enterprise. AND AMEND the definition of Enterprise to read: "<u>for the purposes of Chapter 3.11</u>, means one or more parcels..." AND DELETE the words "principle" and replace with "<u>principal</u>".</p>	<p>opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-230	<p>Enterprise definition Support with amendments</p> <p>AMEND the last sentence of the definition of "Enterprise" to read: "An enterprise is considered to be within a sub- catchment if the greatest proportion of that enterprise is within the sub-catchment".</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		V1PC1-1530	<p>Enterprise definition Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3671: [AMEND the Glossary definition of Enterprise to</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its</p>

			<p>clarify the scope and nature of an enterprise. AND AMEND the definition of Enterprise to read: "<u>for the purposes of Chapter 3.11</u>, means one or more parcels..." AND DELETE the words "principle" and replace with "<u>principal</u>".]</p>	<p>own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-3673	<p>Nitrogen Reference Point definition Support the provision with amendments</p> <p>AMEND the Glossary definition of Nitrogen Reference Point to read: "The nitrogen loss number (units of kg N/ha/year) that is derived from an OVERSEER use protocol compliant OVERSEER® file that describes the property or farm enterprise and farm practices in an agreed year or years developed by a Certified Farm Nutrient Advisor, using the current version of the OVERSEER ® model (or another model approved by the Council) for the property or enterprise at the "reference" point in time. is: <u>1) For commercial vegetable production, the average nitrogen leaching rate (in kilograms of nitrogen per hectare per year) predicted by modelling the nitrogen reference period data in the current version of OVERSEER®.</u> <u>2) For all other land uses, the nitrogen leaching rate (in kilograms of nitrogen per hectare per year) predicted by modelling the Nitrogen Reference Point data in the current version of Overseer®.</u>" AND AMEND the Glossary definition of Nitrogen Reference Point, to include changes that result</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>

			from the incorporation of new land into a property and which are approved by the Council.	
		V1PC1-1532	<p>Nitrogen Reference Point definition Support with amendments</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3673: [AMEND the Glossary definition of Nitrogen Reference Point to read: "The nitrogen loss number (units of kg N/ha/year) that is derived from an OVERSEER use protocol compliant OVERSEER® file that describes the property or farm enterprise and farm practices in an agreed year or years developed by a Certified Farm Nutrient Advisor, using the current version of the OVERSEER ® model (or another model approved by the Council) for the property or enterprise at the "reference" point in time.</p> <p>is:</p> <p><u>1) For commercial vegetable production, the average nitrogen leaching rate (in kilograms of nitrogen per hectare per year) predicted by modelling the nitrogen reference period data in the current version of OVERSEER®.</u></p> <p><u>2) For all other land uses, the nitrogen leaching rate (in kilograms of nitrogen per hectare per year) predicted by modelling the Nitrogen Reference Point data in the current version of Overseer®."</u></p> <p>AND AMEND the Glossary definition of Nitrogen Reference Point, to include changes that result from the incorporation of new land into a property and which are approved by the Council.]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
Waikato River	74033	PC1-11564	Rule 3.11.5.3	WPL opposes the

Authority			No specific decision requested for Rule 3.11.5.3.	submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-1016	Rule 3.11.5.3 APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11564: [No specific decision requested for Rule 3.11.5.3.]	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		V1PC1-369	Rule 3.11.5.7 Support RETAIN Rule 3.11.5.7 in PPC1.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-11563	Schedule 1 AMEND Schedule 1 to include a requirement for Farm Environment Plan actions related to the four contaminants to be implemented within a specified timeframe AND AMEND to strengthen the implementation aspects of Farm Environment Plans, especially in relation to the management of contaminants other than nitrogen so that there is a transparent process that ensures accountability and	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent

			compliance with such plans.	with the specific decisions sought by WPL in its own submissions.
		PC1-11559	<p>Table 3.11-1</p> <p>AMEND Table 3.11-1 so that as a minimum, limits are set at current contaminant levels for all sub-catchments along with a clear directive that these contaminant levels shall not increase</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		V1PC1-1011	<p>Table 3.11-1</p> <p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11559: [AMEND Table 3.11-1 so that as a minimum, limits are set at current contaminant levels for all sub-catchments along with a clear directive that these contaminant levels shall not increase]</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

Wairarapa Moana Inc	72480	PC1-2065	Map 3.11-1 Oppose the provision with amendments REPLACE Map 3.11-1 with a new sub-catchment map.	WPL supports the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-2076	Objective 1 Support the provision with amendments AMEND FMU Map to show re-defined FMU's based on revised sub-catchments, taking into account the physical attributes of land areas. (Objective 1)	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-2079	Objective 3 Support the provision with amendments AMEND in Objective 3 FMU's to be comprised of sub-catchments that are grouped together by similar physical attributes.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its

				own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-2081	Objective 4 Support the provision RETAIN Objective 4.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-2084	Policy 1 Support the provision with amendments REPLACE Policy 1(b) with the following: <u>"Requiring all farming activities to apply Best Management Practices to mitigate the discharge of all contaminants to water bodies (nitrogen, phosphorus, sediment and microbial pathogens)."</u>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-2102	Policy 4 Support the provision with amendments	WPL supports and opposes the

			<p>ADD the following to Policy 4: "<u>as long as there is no increase in discharges of nitrogen, phosphorus, sediment and microbial pathogens from property or enterprise.</u>"</p> <p>AND ADD the following: "<u>enable activities with lower discharges to continue or to be established, but with the requirement that they include good management practices for the mitigation of contaminant discharges in Farm Environment Plans and implement such mitigation practices.</u>"</p>	<p>submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-2111	<p>Policy 6 Support the provision</p> <p>RETAIN Policy 6.</p>	<p>WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.</p>
		PC1-2112	<p>Policy 7 Oppose the provision with amendments</p> <p>DELETE Policy 7 reference to land suitability and REPLACE with 'future allocation method.' AND DELETE Footnote 5. AND AMEND Policy 7(c) to read as follows: "Minimise <u>economic hardship and social</u> disruption and costs in the transition..."</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own</p>

				submissions.
		PC1-2126	<p>Method 3.11.4.7 Oppose the provision with amendments</p> <p>DELETE the reference to land suitability in Method 3.11.4.7 AND AMEND to include a clause 'vi' under (b) that reads as follows: "<u>Gather information and fully investigate the effects the hydro system has on water quality and water monitoring readings [to better under] in order to decide future allocations.</u>"</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-2140	<p>Rule 3.11.5.2 Support the provision</p> <p>RETAIN Rule 3.11.5.2 as proposed.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-2141	<p>Rule 3.11.5.3 Oppose the provision with amendments</p> <p>AMEND the implementation date for Farm Environment Plans for all sub-catchments to 1st July 2020 and amend dates accordingly in Rule 3.11.5.3(5)(b) and (5)(c). AND DELETE reference to the 75th percentile nitrogen leaching value.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this

				would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-2142	<p>Rule 3.11.5.4 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.4 the implementation date for Farm Environment Plans for all sub-catchments to 1st July 2020. AND DELETE reference to the 75th percentile nitrogen leaching value.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-2143	<p>Rule 3.11.5.6 Support the provision</p> <p>RETAIN Rule 3.11.5.6 as proposed.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-2144	<p>Rule 3.11.5.7 Support the provision</p> <p>RETAIN Rule 3.11.5.7 as proposed.</p>	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks

				that it should be disallowed.
		PC1-2146	<p>Schedule B Oppose the provision with amendments</p> <p>AMEND Schedule B to incorporate the Nitrogen Reference Point and use in Farm Environment Plans as a Best Practice Management Tool. AND develop protocols for the use of actual input data for the OVERSEER Model. AND CLARIFY how new versions of Overseer will be handled and which version Schedule B is based on.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-2148	<p>Schedule 1 Support the provision with amendments</p> <p>DELETE reference to the 75th percentile nitrogen leaching value. AND DELETE reference to land capability from Schedule 1(2)(d).</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-12548	<p>Schedule 1 Support the provision with amendments</p>	WPL supports and opposes the

			Schedule 1 - ADD a clause to ensure that Waikato Regional Council will provide Best Managements Practice guidelines for actions or measures to mitigate contaminant discharge in relation to a range of land uses, stock policies, land types and other biophysical factors and that such mitigating actions or measures are to be included in Farm Environment Plans and implemented on all properties across the region.	submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-2155	Table 3.11-1 Oppose the provision with amendments AMEND Table 3.11-1 to provide attribute information at sub-catchment scale. AND REPLACE Map 3.11-1 with a new Map 3.11-2 AND REPLACE Map 3.11-2 with new sub-catchments that align with the physical attributes of the land.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-2159	Glossary of Terms Oppose the provision with amendments ADD a definition of 'property' to read as follows: <u>"One contiguous block of land owned by one common owner."</u> AND ADD a definition of 'common owner' to read	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be

			as follows: " <u>100% ownership.</u> " AND ADD a definition for the version of the OVERSEER Model that will be used to calculate the Nitrogen Reference Point and future versions. Define past, current and future.	disallowed.
		PC1-2158	75 th percentile nitrogen leaching value definition Oppose the provision DELETE Definition - 75th Percentile Nitrogen leaching value.	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
Waitomo District Council	73688	PC1-10313	Objective 1 Support the provision RETAIN Objective 1.	WPL opposes the submission because it is not consistent with the decisions sought by WPL in its own submissions, and seeks that it should be disallowed.
		PC1-10315	Objective 3 Support the provision with amendments AMEND Objective 3 to read: "Short term Improvements to water (ie. <u>By 2026</u>)..."	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its

				own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10317	<p>Policy 6 Oppose the provision</p> <p>AMEND Policy 6 so that the relationship between Policy and Rule 3.11.5.7 is clear AND AMEND Policy 6 (and other policies as required) so as to clearly differentiate between rural and urban land use and diffuse and point source discharges AND AMEND to address the policy disconnect between Policies 10 to 12 and Policy 6 [Policies 10 to 12 assume that certain discharges can have an adverse effect to a point and may increase, but Policy 6 does not make the same allowance].</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10328	<p>Rule 3.11.5.2 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.2 to clarify how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance AND AMEND Rules 3.11.5.2 provisions specifying the Nitrogen Reference Point be calculated and not exceeded, and instead use the Nitrogen Reference Point as part of a Farm Environment</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent

			Plan to inform mitigation measures.	with the specific decisions sought by WPL in its own submissions.
		PC1-10330	<p>Rule 3.11.5.3 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.3 to clarify how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance.</p> <p>AND AMEND in Rule 3.11.5.3 the provisions that specifying the Nitrogen Reference Point be calculated and not exceeded, and instead use the Nitrogen Reference Point as part of a Farm Environment Plan to inform mitigation measures.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10332	<p>Rule 3.11.5.4 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.4 to clarify how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance</p> <p>AND AMEND to include additional matters of control, standards and terms and matters of discretion providing for offset mitigation, generally as outlined in Policy 11. The matters should specify the offset: is for the same contaminant; occurs in the same sub-catchment, or if not practicable within the same Freshwater Management Unit; and remains in place for the duration of the consent and is secured by</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			<p>consent condition AND AMEND in Rule 3.11.5.4 the provisions that specifying the Nitrogen Reference Point be calculated and not exceeded, and instead use the Nitrogen Reference Point as part of a Farm Environment Plan to inform mitigation measures.</p>	
		PC1-10333	<p>Rule 3.11.5.5 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.5 to clarify how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance AND AMEND to include additional matters of control, standards and terms and matters of discretion providing for offset mitigation, generally as outlined in Policy 11. The matters should specify the offset: is for the same contaminant; occurs in the same sub-catchment, or if not practicable within the same Freshwater Management Unit; and remains in place for the duration of the consent and is secured by consent condition AND AMEND in Rule 3.11.5.5 the provisions that specifying the Nitrogen Reference Point be calculated and not exceeded, and instead use the Nitrogen Reference Point as part of a Farm Environment Plan to inform mitigation measures.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10334	<p>Rule 3.11.5.6 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.6 to clarify how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and</p>

			AND AMEND to include additional matters of control, standards and terms and matters of discretion providing for offset mitigation, generally as outlined in Policy 11. The matters should specify the offset: is for the same contaminant; occurs in the same sub-catchment, or if not practicable within the same Freshwater Management Unit; and remains in place for the duration of the consent and is secured by consent condition.	seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-13125	<p>Rule 3.11.5.6 Oppose the provision with amendments</p> <p>AMEND in Rule 3.11.5.6 the provisions that specifying the Nitrogen Reference Point be calculated and not exceeded, and instead use the Nitrogen Reference Point as part of a Farm Environment Plan to inform mitigation measures.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10335	<p>Rule 3.11.5.7 Oppose the provision with amendments</p> <p>AMEND Rule 3.11.5.7 to clarify how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance</p> <p>AND AMEND to include additional matters of control, standards and terms and matters of discretion providing for offset mitigation,</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this

			<p>generally as outlined in Policy 11. The matters should specify the offset: is for the same contaminant; occurs in the same sub-catchment, or if not practicable within the same Freshwater Management Unit; and remains in place for the duration of the consent and is secured by consent condition</p> <p>AND REPLACE with a rule that specifies that the land use changes specified in it are a discretionary activity with specific criteria to measure applications against including whether the loss of contaminants will be the same or lower than existing land use.</p> <p>AND AMEND to take an effects based approach, allowing intensification where contaminant discharges are maintained, reduced or offset</p> <p>AND AMEND Rule 3.11.5.7 and the associated definitions to make it clear how horticulture/viticulture and intensive outdoor animal rearing are covered</p> <p>AND AMEND to explain how Rule 3.11.5.7 is to be administered where there is a mix of varied land use changes within the same property or enterprise</p> <p>AND ADD provisions to encourage lower intensity land use changes such as forestry planting or pasture retirement.</p>	would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10341	<p>Schedule B</p> <p>Oppose the provision with amendments</p> <p>AMEND Schedule B discharge provisions to take account of sub-catchment differences AND REPLACE the Nitrogen Reference Point catchment-wide approach with a sub-catchment planning and management alongside the implementation of robust Farm Environment</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be

			<p>Plans. AND REMOVE the use of modelled (the OVERSEER Model) numerical values of nitrogen discharges to determine resource consent status and compliance with standards AND CONSIDER the risks cost and benefits of Overseer in more detail AND AMEND to replace the nitrogen management provisions with an emphasis on Farm Environment Plans and robust sub-catchment planning and management. AND CLARIFY how Phosphorus is being measured in the Waipā Freshwater Management Unit.</p>	<p>allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-10856	<p>Schedule 1 Oppose the provision with amendments</p> <p>AMEND Schedule 1 requirements to remove reference to 'appropriate' and other subjective provisions and replace them with specific measurable language OR AMEND the Farm Environment Plan provisions so that they inform mitigation measures that must be complied with, rather than set the standards themselves.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.</p>
		PC1-12552	<p>Schedule 1 Oppose the provision with amendments</p> <p>AMEND Schedule 1 to ensure appropriate account has been taken in setting the E.coli limits to make allowance for peak flooding events.</p>	<p>WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and</p>

				seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10848	<p>Table 3.11-1 Support the provision with amendments</p> <p>AMEND Table 3.11-1 to include its number (3.11-1) in the title of the table AND ADD a definition of 'short term' as 'by 2026' AND ADD a map identifying the locations of the monitoring sites in Table 3.11-1 AND ensure appropriate account has been taken in setting the E.coli limits to make allowance for peak flooding events AND CLARIFY how phosphorus is being measured in the Waipā Freshwater Management Unit.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
		PC1-10851	<p>Certified Farm Nutrient Advisor definition Oppose the provision</p> <p>Rationalise the definitions of 'Certified Farm Nutrient Advisor' and 'Certified Nutrient Management Advisor' in the Regional Plan and PPC1 so they are the same.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific

				decisions sought by WPL in its own submissions.
		PC1-10853	<p>Farming activities definition Oppose the provision</p> <p>AMEND the glossary of terms to rationalise the definitions of 'Farming Activities' in PPC1 and the Waikato Regional Plan so they are the same.</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.
Watercare Services Ltd	74077	PC1-8435	<p>Table 3.11-1 Support the provision with amendments</p> <p>AMEND Table 3.11-1/PPC1 to recognise the seasonality effects of point source discharges as is current practice with many existing discharge consents to the Waikato River AND CLARIFY how historical water quality data has been handled to derive water quality targets for ammonia and the implication for addressing effects of point source discharges AND AMEND in Table 3.11-1 the longterm water quality targets for Total Nitrogen, Total Phosphorus and Chlorophyll-a to recognise the gradual deterioration of water quality along the length of the Waikato River and the artificial boundaries between the upper and lower</p>	WPL supports and opposes the submission because it is generally consistent with the key points made by WPL in its own submissions, and seeks that the submission should be allowed insofar as this would be consistent with the specific decisions sought by WPL in its own submissions.

			catchment be removed.	
X				
Y				
Z				

APPENDIX G

Address list for submitters for service

ID	Submitter	Address for service
72441	Advisory Committee on Regional Environment (ACRE)	Kemble Jonathan Pudney 11 Bellwood Place Chartwell Hamilton 3210 pudneyquinn@vodafone.co.nz
74045	Ata Rangi 2015 Limited Partnership	Marianne Mackintosh Tompkins Wake Westpac House PO Box 258 Hamilton 3240 marianne.mackintosh@tompkinswake.co.nz
74085	Auckland / Waikato Fish and Game Council	Ben Wilson 156 Brymer Road RD9 Hamilton bwilson@awfg.org.nz
74036	Ballance Agri-Nutrients Ltd	Kevin Wood Private Bag 12 503 Tauranga Mail Centre Tauranga 3143 kevin.wood@ballance.co.nz
73369	Beef + Lamb New Zealand Ltd	Matt Harcombe, Julia Betjeman, Corina Jordan 1/585 Wairakei Road Canterbury Christchurch 8545 corina.jordan@beeflambnz.com matt.harcombe@beeflambnz.com
74026	CNI Iwi Land Management Ltd	Bridget Robson 21 Carling Road Whakatane 3120 bridget@eland.co.nz
74050	DairyNZ	Justine Young Cnr Ruakura and Morrinsville Roads Newstead Private Bag 3225 Hamilton 3240 Justine.Young@dairynz.co.nz
71759	Department of Conservation	Gemma White and David Spiers Director-General of Conservation Private Bag 3072 Hamilton 3240 gwhite@doc.govt.nz

73355	Farmers 4 Positive Change (F4PC)	Rick Burke 181 Lund Road RD2 Katikati 3178 pukeaurifarms@netsmart.net.nz
73720	FarmRight	Louise Wallace 15-17 Tuhoro Street Otorohanga 3900 llwallace@farmright.co.nz
74191	Federated Farmers of New Zealand	Nikki Edwards PO Box 447 Hamilton 3240 nedwards@fedfarm.org.nz
73305	Fertiliser Association of New Zealand	Greg Sneath PO Box 11519 Manners Street Central Wellington 6142 greg@fertiliser.org.nz
74057	Fonterra Co-operative Group Ltd	Richard Allen 80 London Street PO Box 459 Hamilton 3204 Charlotte.Rutherford@fonterra.com Richard.Allen@fonterra.com
72610	Fonterra Shareholders Council	Duncan Coull 740 Ouruwhero Road RD4 Otorohanga 3974 duncan@ruralbusinesssolutions.co.nz
74052	Genesis Energy Ltd	Nigel Goodhue Private Bag 3131 Hamilton 3204 Abbie.Fowler@genesisenergy.co.nz Nigel.Goodhue@genesisenergy.co.nz
73953	Genetic Technologies Ltd	Ian Williams PO Box 105-303 Auckland 1143 iwilliams@genetic.co.nz
73724	Hancock Forest Management (NZ) Ltd	Sally Strang PO Box 648 Tokoroa 3420 sstrang@hnrng.com
73801	Horticulture New Zealand (HortNZ)	Astra Foster PO Box 10-232

		Wellington 6143 angela.halliday@hortnz.co.nz astra.foster@hortnz.co.nz
73419	Matamata-Piako District Council	Mark Hamilton PO Box 266 Te Aroha 3342 mhamilton@mpdc.govt.nz
73182	Mercury NZ Ltd	Miles Rowe PO Box 445 Hamilton 3240 miles.rowe@mercury.co.nz
73492	Miraka Ltd	Grant Jackson 108 Tuwharetoa Street PO Box 740 Taupo 3352 Grant.Jackson@miraka.co.nz
73524	New Zealand Forest Owners Association Inc	Venise Comfort Level 9, 93 The Terrace Wellington 6143 david.rhodes@nzfoa.org.nz venise.comfort@nzfoa.org.nz
73025	Ngati Haua Tribal Trust	Linda Raupita PO Box 1010 Cambridge 3450 s.raupita@xtra.co.nz
73725	Oji Fibre Solutions (NZ) Ltd	Gill Chappell PO Box 87070 Meadowbank Auckland 1742 gkchappell@xtra.co.nz
74000	Pamu Farms of New Zealand	Robert van Duivenboden Landcorp Farming Ltd Level 2, 15 Allen Street Te Aro Wellington 6011 vanduivenbodenr@landcorp.co.nz
73859	Perrin Ag Consultants Ltd	Lee Matheson PO Box 596 Rotorua 3040 lee@perrinag.net.nz
74171	Primary Land Owners Group	Martyn Callaghan PO Box 587 Pukekohe 2340 info@plug4growth.co.nz

71427	Primary Land Owners Group	Peter Buckley, Bruce Cameron, and Andy Loader PO Box 913 Pukekohe 2340 pbuckley1036@gmail.com info@plug4growth.co.nz
74058	Ravensdown Ltd	Carmen Taylor Planz Consultants 8 Stafford Street Dunedin 9016 carmen@planzconsultants.co.nz
73159	Rayonier Matariki Forests	Stephen Glenn Chandler PO Box 745 Rangiora 7440 steve.chandler@rayonier.com
73373	Rotorua Lakes Council	Chris Dillon 1061 Haupapa Street Rotorua 3046 chris.dillon@rotorualc.nz
72459	Save Lake Karapiro Inc	Angus Robson 110 Tower Road RD1 Piopio 3970 apr@xtra.co.nz
72892	South Waikato District Council	Sharon Robinson Private Bag 7 Tokoroa 3444 Craig.Hobbs@southwaikato.govt.nz Sharon.Robinson@southwaikato.govt.nz
74207	Taupo District Council	David J Trewavas Private Bag 2005 Taupo Mail Centre Taupo 3352 smavor@taupo.govt.nz
74105	Te Whakakitenga o Waikato Inc (Waikato-Tainui)	Taroi Rawiri PO Box 648 Hamilton 3240 Tim.Manukau@tainui.co.nz Taroi.Rawiri@tainui.co.nz
74122	The Royal Forest and Bird Protection Society of New Zealand Inc	Jen Miller PO Box 2516 Christchurch 8140 j.miller@forestandbird.org.nz
74049	Waikato Dairy Leaders	Justine Young

	Group	Cnr Ruakura and Morrinsville Roads Newstead Private Bag 3225 Hamilton 3240 Justine.Young@dairynz.co.nz
73418	Waikato District Council (WDC)	15 Galileo Street Ngaruawahia 3720 Stephen.Howard@waidc.govt.nz
72890	Waikato Regional Council (WRC)	Andrew Tester Private Bag 3038 Waikato Mail Centre Hamilton 3240 Macaela.Flanagan@waikatoregion.govt.nz Andrew.Tester@waikatoregion.govt.nz
74033	Waikato River Authority	Bob Penter PO Box 9338 Hamilton 3204 bob@waikatoriver.org.nz
72480	Wairarapa Moana Inc	Jude Addenbrooke 271 Mystery Creek Road Ohaupo 3881 nick@wairarapamoana.org.nz environment@addenbrooke.nz
73688	Waitomo District Council	Cathy O'Callaghan PO Box 404 Queen Street Te Kuiti 3941 Cathy.O'Callaghan@waitomo.govt.nz
74077	Watercare Services Ltd	Mark Bourne Private Bag 92 521 Wellesley Street Auckland 1141 Mark.Bourne@water.co.nz