



# **SUMMARY OF DECISIONS REQUESTED TO PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPĀ RIVER CATCHMENTS**

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## Samuel, Criton Karaitiana

Submitter ID: 71617

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-1674	Oppose the provision	DELETE Policy 2c.
Schedule B - Nitrogen Reference Point	PC1-1675	Oppose the provision	DELETE Schedule B.

## Sanford, John

Submitter ID: 60715

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-4755	Oppose the provision with amendments	AMEND Rule 3.11.5.1 by exempting 10 stocking units per hectare from resource consents.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-4765	Oppose the provision	DELETE Rule 3.11.5.2.
Schedule B - Nitrogen Reference Point	PC1-3510	Oppose the provision	DELETE Schedule B AMEND PPC1 (Schedule B) requiring a management plan for land 2 hectares plus.
Schedule C - Stock exclusion	PC1-3515	Oppose the provision	AMEND Schedule C by providing a greater definition of water.

## Sanson, Allan and Patricia

Submitter ID: 73081

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-3716	Support the provision with amendments	DELETE Rule 3.11.5.7 non-complying activity Rule AND REPLACE with a restricted discretionary activity Rule.

## Sattrup, Grahame Paul

Submitter ID: 73709

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-9393	Oppose the provision	REMOVE the Nitrogen Reference Point from PPC1 AND REPLACE with a plan to implement control measures for koi carp.
Use values - Primary production	PC1-9405	Support the provision	No specific decision was requested for Values and Uses - Primary Production.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-9386	Support the provision	No specific decision sought for Policy 9.
3.11.4.5 Sub-catchment scale planning	PC1-9375	Support the provision with amendments	AMEND Method 3.11.4.5 to include a holistic approach with particular reference to Koi Carp.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-9387	Oppose the provision	No specific decision was requested for Rule 3.11.5.2.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-9389	Oppose the provision	No specific decision was requested for Rule 3.11.5.4.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-9390	Oppose the provision	No specific decision was requested for Rule 3.11.5.7.
Schedule B - Nitrogen Reference Point	PC1-9391	Oppose the provision	DELETE Schedule B in its entirety.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-9392	Support the provision	No specific decision was requested for Table 3.11-1.

## Save Lake Karapiro Inc

Submitter ID: 72459

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-5586	Oppose the provision	REMOVE the use of allocation or benchmarking in PPC1 AND REPLACE with provisions that use pollution levies based on the outputs above the assimilative capacity of land AND AMEND PPC1 to commit to actual restoration progress.
3.11.1.2 Mana Tangata – Use values	PC1-5610	Oppose the provision	REMOVE the timeframe for events beyond the life of the plan. (3.11.1.2 Mana Tangata - use values). AND AMEND PPC1 to ensure that as much as possible can be done to improve water quality within the life of PPC1.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND PPC1 so that if economic models are to be used to drive PPC1 they must include all missing factors identified in the submission.</p> <p>AND AMEND PPC1 to treat drainage as a central part of the problem, solve the cultural problem of the 'get rid of water mentality', put a price on quality soil based on the amount it costs to make a cubic metre of topsoil then assess the loss and levy it. Show by research the value of reducing overland flow velocities in terms of reduction in lost sediment, Phosphorus and pathogens and use these velocity and flow rate reductions as part of best practice mitigations.</p>
Objective 3: 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	PC1-5634	Oppose the provision	<p>REMOVE the timeframe in Objective 3.</p> <p>AND AMEND PPC1 to require best current practices to be used for all polluting activities.</p> <p>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>
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-5609	Oppose the provision	<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>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12904	Oppose the provision	<p>Policy 2- REMOVE the use of the OVERSEER Model from PPC1 and do not use it for any mitigation practice.</p> <p>AND REMOVE the use of Overseer or any other measuring tool in PPC1 until it is accurate both relatively and absolutely.</p> <p>AND DELETE the use of benchmarking or allocation.</p> <p>AND AMEND PPC1 to prohibit and strongly prosecute the worst practices maintaining pressure on the 'tail' as it improves.</p>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-5645	Oppose the provision	<p>Policy 2 - DELETE the use of industry self-management schemes</p> <p>AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives</p> <p>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>AND DELETE the use of a proportional system in PPC1 and REPLACE with pollution levies.</p>
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-5670	Oppose the provision	<p>Policy 3: REMOVE the use of OVERSEER Model or any other measuring tool in PPC1 until it is accurate both relatively and absolutely</p> <p>AND DELETE the use of benchmarking or allocation</p> <p>AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives</p> <p>AND AMEND PPC1 to prohibit and strongly prosecute the worst practices maintaining pressure on the 'tail' as it improves</p> <p>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>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND DELETE the use of a proportional system in PPC1 and REPLACE with pollution levies.
Policy 5: Staged approach	PC1-5642	Oppose the provision	REMOVE the timeframe in Policy 5. 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.
Policy 7: Preparing for allocation in the future	PC1-5703	Oppose the provision	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.
Policy 10: Provide for point source discharges of regional significance	PC1-5693	Oppose the provision	AMEND Policy 10 so that all infrastructure, whether significant under this definition or not should be in play for making mitigations which are effective provided the mitigations do not force the infrastructure to be unfit for purpose either economic or physical.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-5727	Oppose the provision	DELETE the use of offset programs. Policy 11 REPLACE with the use of pollution levies to achieve the required outcome.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-5724	Oppose the provision	AMEND Policy 12 so that all infrastructure, whether significant under this definition or not should be in play for making mitigations which are effective provided the mitigations do not force the infrastructure to be unfit for purpose either economic or physical.
Policy 13: Point sources consent duration	PC1-5733	Oppose the provision	AMEND Policy 13 by reducing the timeframe to 10 years with 10 year automatic rollover if audits are clean.
Policy 14: Lakes Freshwater Management Units	PC1-5643	Oppose the provision	REMOVE the timeframe in Policy 14. 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.
3.11.4.5 Sub-catchment scale planning	PC1-5740	Support the provision	RETAIN Method 5 but ensure there is some measure of accountability and sanction for poor performance.
3.11.4.6 Funding and implementation	PC1-5741	Support the provision	RETAIN Method 3.11.4.6 but ensure there is some measure of accountability and sanction for poor performance.
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-5742	Oppose the provision	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.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-5744	Oppose the provision	AMEND Rule 3.11.5.1 so that all conditions of the RMA must be met.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-5709	Oppose the provision	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.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives.</p> <p>AND AMEND PPC1 to prohibit and strongly prosecute the worst practices maintaining pressure on the 'tail' as it improves.</p> <p>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>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-5711	Oppose the provision	<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)</p> <p>AND DELETE the use of benchmarking or allocation.</p> <p>AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives.</p> <p>AND AMEND PPC1 to prohibit and strongly prosecute the worst practices maintaining pressure on the 'tail' as it improves.</p> <p>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>Proportionality</p> <p>DELETE the use of a proportional system in PPC1 and REPLACE with pollution levies.</p> <p>Allocation</p> <p>REMOVE the use of allocations or benchmarking.</p> <p>AND AMEND to use pollution levies based on the outputs above the assimilative capacity of land.</p> <p>AND REPLACE the use of Overseer with a measuring system that works.</p> <p>Self Management</p> <p>DELETE the use of industry self management schemes.</p>
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-5716	Oppose the provision	<p>Nitrogen Reference Point</p> <p>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)</p> <p>AND DELETE the use of benchmarking or allocation.</p> <p>AND AMEND PPC1 to use and drive best management practices to achieve the pollution reduction objectives.</p> <p>AND AMEND PPC1 to prohibit and strongly prosecute the worst practices maintaining pressure on the 'tail' as it improves.</p> <p>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>Proportionality</p> <p>DELETE the use of a proportional system in PPC1 and REPLACE with pollution levies.</p> <p>Allocation</p> <p>REMOVE the use of allocations or benchmarking.</p> <p>AND AMEND to use pollution levies based on the outputs above the assimilative capacity of land.</p> <p>AND REPLACE the use of Overseer with a measuring system that works.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-5717	Oppose the provision	Schedule B: 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. 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.
Schedule C - Stock exclusion	PC1-5746	Oppose the provision	AMEND Schedule C 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.
Schedule 1 - Requirements for Farm Environment Plans	PC1-5719	Oppose the provision	Nitrogen Reference Point Schedule 1: 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.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12510	Oppose the provision	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.
Schedule 2 - Certification of Industry Schemes	PC1-5745	Oppose the provision	Schedule 2: DELETE the use of industry self-management schemes.

## Saxton, David Christopher

Submitter ID: 73946

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-3345	Oppose the provision	DELETE PPC1 and RENOTIFY PPC1 when the entire Waikato catchment can be included.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AMEND to provide for the social and economic well-being of the people and communities of the Waikato catchment AND AMEND to address the other significant water quality issues such as pest fish and bird populations; point source polluters; rubbish dump leachate; human sewage; and runoff from paved areas.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-3352	Oppose the provision	DELETE the use of the Nitrogen Reference Point from PPC1. DELETE the use of the OVERSEER Model from PPC1.
Objective 4: People and community resilience	PC1-3354	Oppose the provision	DELETE the use of the Nitrogen Reference Point from PPC1. DELETE the use of the OVERSEER Model from PPC1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-3355	Oppose the provision	DELETE the use of the Nitrogen Reference Point from PPC1 DELETE the use of the OVERSEER Model from PPC1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12905	Support the provision with amendments	AMEND the stock exclusion provisions of Policy 2 so exclusion is only required for waterbodies greater than 1m wide and where it is reasonable and practical to do so. Financial support from the Waikato Regional Council or Central Government is required for the construction of stock exclusion fencing. Consideration must also be given for the ongoing maintenance of fencing, the waterbody, any planting and the control of weeds within the exclusion zone.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12906	Support the provision with amendments	RETAIN the Farm Environment Plan provisions of Policy 2 but they must be cost effective, simple, practicable and achievable.
Policy 6: Restricting land use change	PC1-3351	Oppose the provision	DELETE Policy 6 AND REPLACE with provisions that make the Farm Environment Plan the mechanism that drives water quality improvements. The focus of the Farm Environment Plan should be on environmental outcomes.
Policy 7: Preparing for allocation in the future	PC1-3356	Oppose the provision	DELETE the use of the Nitrogen Reference Point from PPC1. AND DELETE the use of the OVERSEER Model from PPC1.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-3799	Oppose the provision	DELETE Policy 16.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-3357	Oppose the provision	DELETE the use of the Nitrogen Reference Point from PPC1 DELETE the use of the OVERSEER Model from PPC1. AMEND the stock exclusion provisions of Rule 3.11.5.2 so exclusion is only required for waterbodies greater than 1m wide and where it is reasonable and practical to do so. Financial support from the Waikato Regional Council or Central Government is required for the construction of stock exclusion fencing. Consideration must also be given for the ongoing maintenance of fencing, the waterbody, any planting and the control of weeds within the exclusion zone.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-3358	Oppose the provision	DELETE the use of the Nitrogen Reference Point from PPC1. DELETE the use of the OVERSEER Model from PPC1. AMEND the stock exclusion provisions of Rule 3.11.5.3 so exclusion is only required for waterbodies greater than 1m wide and where it is reasonable and practical to do so. Financial support from the Waikato Regional Council or Central Government is required for the construction of stock exclusion fencing. Consideration must also be given for the ongoing maintenance of fencing, the waterbody, any planting and the control of weeds within the exclusion zone. RETAIN the Farm Environment Plan provisions of Rule 3.11.5.3 but they must be cost effective, simple, practicable and achievable.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-3359	Oppose the provision	DELETE the use of the Nitrogen Reference Point from PPC1 AND DELETE the use of the OVERSEER Model from PPC1. AMEND the stock exclusion provisions of Rule 3.11.5.4 so exclusion is only required for waterbodies greater than 1m wide and where it is reasonable and practical to do so. Financial support from the Waikato Regional Council or Central Government is required for the construction of stock exclusion fencing. Consideration must also be given for the ongoing maintenance of fencing, the waterbody, any planting and the control of weeds within the exclusion zone AND RETAIN the Farm Environment Plan provisions of Rule 3.11.5.4 but they must be cost effective, simple, practicable and achievable.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-3360	Oppose the provision	DELETE the use of the Nitrogen Reference Point from PPC1. Rule 3.11.5.5 DELETE the use of the OVERSEER Model from PPC1. AMEND the stock exclusion provisions of Rule 3.11.5.5 so exclusion is only required for waterbodies greater than 1m wide and where it is reasonable and practical to do so. Financial support from the Waikato Regional Council or Central Government is required for the construction of stock exclusion fencing. Consideration must also be given for the ongoing maintenance of fencing, the waterbody, any planting and the control of weeds within the exclusion zone.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-3361	Oppose the provision	DELETE the use of the Nitrogen Reference Point from PPC1. DELETE the use of the OVERSEER Model from PPC1.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13090	Support the provision with amendments	AMEND the stock exclusion provisions of Rule 3.11.5.6 so exclusion is only required for waterbodies greater than 1m wide and where it is reasonable and practical to do so. Financial support from the Waikato Regional Council or Central Government is required for the construction of stock exclusion fencing. Consideration must also be given for the ongoing maintenance of fencing, the waterbody, any planting and the control of weeds within the exclusion zone.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-3362	Oppose the provision	DELETE in Rule 3.11.5.7 the use of the Nitrogen Reference Point from PPC1. DELETE the use of the OVERSEER Model from PPC1. AMEND the stock exclusion provisions of Rule 3.11.5.7 so exclusion is only required for waterbodies greater than 1m wide and where it is reasonable and practical to do so. Financial support from the Waikato Regional Council or Central Government is required for the construction of stock exclusion fencing. Consideration must also be given for the ongoing maintenance of fencing, the waterbody, any planting and the control of weeds within the exclusion zone. DELETE Rule 5.11.5.7

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND REPLACE with provisions that make the Farm Environment Plan the mechanism that drives water quality improvements. The focus of the Farm Environment Plan should be on environmental outcomes.
Schedule B - Nitrogen Reference Point	PC1-3363	Oppose the provision	DELETE the use of the Nitrogen Reference Point from PPC1 - Schedule B DELETE the use of OVERSEER from PPC1.
Schedule C - Stock exclusion	PC1-3366	Oppose the provision	AMEND Schedule C so exclusion is only required for waterbodies greater than 1m wide and where it is reasonable and practical to do so. Financial support from the Waikato Regional Council or Central Government is required for the construction of stock exclusion fencing. Consideration must also be given for the ongoing maintenance of fencing, the waterbody, any planting and the control of weeds within the exclusion zone.
Schedule 1 - Requirements for Farm Environment Plans	PC1-3373	Support the provision with amendments	RETAIN Schedule 1 but Farm Environment Plans must be cost effective, simple, practicable and achievable.

## Scheltus and Monzingo, Herwi and Mary

Submitter ID: 71430

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-1215	Oppose the provision	DELETE Rule 3.11.5.7 (1) provisions relating to woody vegetation to farming activities. AND if not deleted, AMEND Rule 3.11.5.7 by removing the reference to 22 October 2016 as a base line for changing land use and replace this with the date when the property was purchased.

## Schuler Brothers Ltd

Submitter ID: 71760

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-5897	Support the provision with amendments	AMEND PPC1 so urban areas are targeted to the same degree as farmers. AND AMEND PPC1 to assess previous efforts farmers have made to improve water quality when considering future restrictions. AND AMEND PPC1 to separately acknowledge the unique management systems of goat farming and its low impact on water quality. AND DELETE use of the OVERSEER Model until it can comprehensively and accurately model all farm systems. AND AMEND PPC1 so ensure stock exclusion requirements only relate to cows, horses, pig and deer.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND PPC1 so that restrictions on land use due to gradient, in-situ grazing of winter forage crops and cultivation are soil type specific.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-5898	Support the provision with amendments	AMEND PPC1 so urban areas are targeted to the same degree as farmers. AND AMEND PPC1 to assess previous efforts farmers have made to improve water quality when considering future restrictions. AND AMEND PPC1 to separately acknowledge the unique management systems of goat farming and its low impact on water quality. AND DELETE use of the OVERSEER Model until it can comprehensively and accurately model all farm systems. AND AMEND PPC1 so ensure stock exclusion requirements only relate to cows, horses, pig and deer. AND AMEND PPC1 so that restrictions on land use due to gradient, in-situ grazing of winter forage crops and cultivation are soil type specific.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-5899	Support the provision with amendments	AMEND PPC1 so urban areas are targeted to the same degree as farmers. AND AMEND PPC1 to assess previous efforts farmers have made to improve water quality when considering future restrictions. AND AMEND PPC1 to separately acknowledge the unique management systems of goat farming and its low impact on water quality. AND DELETE use of the OVERSEER Model until it can comprehensively and accurately model all farm systems. AND AMEND PPC1 so ensure stock exclusion requirements only relate to cows, horses, pig and deer. AND AMEND PPC1 so that restrictions on land use due to gradient, in-situ grazing of winter forage crops and cultivation are soil type specific.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-5901	Support the provision with amendments	AMEND PPC1 so urban areas are targeted to the same degree as farmers. AND AMEND PPC1 to assess previous efforts farmers have made to improve water quality when considering future restrictions. AND AMEND PPC1 to separately acknowledge the unique management systems of goat farming and its low impact on water quality. AND DELETE use of the OVERSEER Model until it can comprehensively and accurately model all farm systems. AND AMEND PPC1 so ensure stock exclusion requirements only relate to cows, horses, pig and deer. AND AMEND PPC1 so that restrictions on land use due to gradient, in-situ grazing of winter forage crops and cultivation are soil type specific.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-5903	Support the provision with amendments	AMEND PPC1 so urban areas are targeted to the same degree as farmers AND AMEND PPC1 to assess previous efforts farmers have made to improve water quality when considering future restrictions AND AMEND PPC1 to separately acknowledge the unique management systems of goat farming and its low impact on water quality AND AMEND PPC1 so that restrictions on land use due to gradient, in-situ grazing of winter forage crops and cultivation are soil type specific.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13091	Oppose the provision with amendments	Rule 3.11.5.6 - DELETE use of the OVERSEER Model until it can comprehensively and accurately model all farm systems.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13092	Support the provision with amendments	AMEND PPC1 so ensure stock exclusion requirements only relate to cows, horses, pig and deer.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-5904	Support the provision with amendments	AMEND PPC1 so urban areas are targeted to the same degree as farmers. AND AMEND PPC1 to assess previous efforts farmers have made to improve water quality when considering future restrictions. AND AMEND PPC1 to separately acknowledge the unique management systems of goat farming and its low impact on water quality. AND DELETE use of the OVERSEER Model until it can comprehensively and accurately model all farm systems. AND AMEND PPC1 so ensure stock exclusion requirements only relate to cows, horses, pig and deer. AND AMEND PPC1 so that restrictions on land use due to gradient, in-situ grazing of winter forage crops and cultivation are soil type specific.
Schedule A - Registration with Waikato Regional Council	PC1-5887	Support the provision with amendments	AMEND PPC1 so urban areas are targeted to the same degree as farmers. AND AMEND PPC1 to assess previous efforts farmers have made to improve water quality when considering future restrictions. AND AMEND PPC1 to separately acknowledge the unique management systems of goat farming and its low impact on water quality. AND DELETE use of the OVERSEER Model until it can comprehensively and accurately model all farm systems. AND AMEND PPC1 so ensure stock exclusion requirements only relate to cows, horses, pig and deer. AND AMEND PPC1 so that restrictions on land use due to gradient, in-situ grazing of winter forage crops and cultivation are soil type specific.
Schedule B - Nitrogen Reference Point	PC1-5895	Support the provision with amendments	AMEND PPC1 so urban areas are targeted to the same degree as farmers. AND AMEND PPC1 to assess previous efforts farmers have made to improve water quality when considering future restrictions. AND AMEND PPC1 to acknowledge the unique management systems of goat farming and its low impact on water quality. AND DELETE use of the OVERSEER Model until it can comprehensively and accurately model all farm systems. AND AMEND PPC1 so ensure stock exclusion requirements only relate to cows, horses, pig and deer. AND AMEND PPC1 so that restrictions on land use due to gradient, in-situ grazing of winter forage crops and cultivation are soil type specific.
Schedule C - Stock exclusion	PC1-5896	Support the provision with amendments	AMEND PPC1 so urban areas are targeted to the same degree as farmers.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND PPC1 to assess previous efforts farmers have made to improve water quality when considering future restrictions.</p> <p>AND AMEND PPC1 to separately acknowledge the unique management systems of goat farming and its low impact on water quality.</p> <p>AND DELETE use of the OVERSEER Model until it can comprehensively and accurately model all farm systems.</p> <p>AND AMEND PPC1 so ensure stock exclusion requirements only relate to cows, horses, pig and deer.</p> <p>AND AMEND PPC1 so that restrictions on land use due to gradient, in-situ grazing of winter forage crops and cultivation are soil type specific.</p>

## Scott, Fiona and John

Submitter ID: 71350

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-870	Support the provision with amendments	Provide certainty around the cost of PPC1 and how this will impact on Council Programmes continuing.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-851	Support the provision with amendments	AMEND Objective 1 to read: "Long-term <del>restoration</del> <u>improvement</u> and protection of water quality for each sub-catchment and Freshwater Management Unit..."
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-853	Support the provision	RETAIN Objective 2.
Objective 3: 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	PC1-854	Support the provision	RETAIN Objective 3.
Objective 4: People and community resilience	PC1-857	Support the provision	RETAIN Objective 4.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-859	Oppose the provision with amendments	AMEND Policy 1 c. to include an exemption from stock exclusion requirements in areas of low intensity farming.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-860	Support the provision	RETAIN Policy 9 as proposed.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-861	Oppose the provision	DELETE Policy 16 in its entirety.
3.11.4.1 Working with others	PC1-862	Support the provision	RETAIN Method 3.11.4.1 as proposed.
3.11.4.3 Farm Environment Plans	PC1-863	Support the provision	RETAIN Method 3.11.4.3 as proposed.
3.11.4.5 Sub-catchment scale planning	PC1-864	Support the provision	RETAIN Method 3.11.4.5 as proposed.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-866	Support the provision with amendments	DELETE Rule 3.11.5.1 (2). AND REPLACE with a fencing policy which allows discretion on a farm by farm basis for low intensity farms.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-867	Support the provision with amendments	DELETE Rule 3.11.5.2 (2) AND DELETE Rule 3.11.5.2 (3). e. AND REPLACE with the Best Practical Option AND REMOVE Rule 3.11.5.2 (4).c.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-868	Support the provision	RETAIN in Rule 3.11.5.6 the terms of notification of consent applications as proposed.
Schedule C - Stock exclusion	PC1-869	Oppose the provision	DELETE Schedule C in its entirety.

## Scott, Kevin

Submitter ID: 73972

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-6591	Oppose the provision	DELETE Rule 3.11.5.2.

## Scott, Neil, Ann, Brent and Louise

Submitter ID: 73024

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-1826	Oppose the provision	AMEND PPC1 to include all areas. AND MAKE any consequential amendments.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-1809	Oppose the provision	AMEND by removing the grandparenting approach from PPC1. AMEND by providing a sub-catchment approach to address the contaminants that are relevant to each area rather than a blanket rule. AND any consequential amendments.
Objective 4: People and community resilience	PC1-1811	Oppose the provision	AMEND by removing the grandparenting approach from PPC1. AMEND by providing a sub-catchment approach to address the contaminants that are relevant to each area rather than a blanket rule. AND any consequential amendments.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-1812	Oppose the provision	AMEND Policy 2 by removing the grandparenting approach from PPC1. AMEND by providing a sub-catchment approach to address the contaminants that are relevant to each area rather than a blanket rule. AND MAKE any consequential amendments.
Policy 7: Preparing for allocation in the future	PC1-1814	Oppose the provision	AMEND Policy 7 by removing the grandparenting approach from the plan AND AMEND by providing a sub-catchment approach to address the contaminants that are relevant to each area rather than a blanket rule AND MAKE any consequential amendments.
3.11.4.5 Sub-catchment scale planning	PC1-1808	Support the provision	Method 3.11.4.5: CONSIDER testing the sub-catchment areas to prove there are no issues with specific waterways. AND any consequential amendments.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-1830	Support the provision with amendments	AMEND to install more troughs where it is practical and likely to decrease stock from getting water within waterways. Rule 3.11.5.1 ADD a water testing system for each sub-catchment to monitor water quality. DELETE stock exclusion provisions from the plan entirely for the submitter's sub-catchment AND MAKE any consequential amendments.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-1825	Support the provision with amendments	AMEND Cultivation Rule 3.11.5.2 for hill country farms where there is generally no land under 15 degrees so that there is a larger zone between the cultivation and the waterways AND MAKE any consequential amendments AND AMEND to install more troughs where it is practical and likely to decrease stock from getting water within waterways AND ADD a water testing system for each sub-catchment to monitor water quality AND DELETE stock exclusion provisions from the plan entirely for the submitters sub-catchment AND MAKE any consequential amendments.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-1816	Support the provision with amendments	AMEND Rule 3.11.5.3 by removing the grandparenting approach from the plan. AMEND by providing a sub-catchment approach to address the contaminants that are relevant to each area rather than a blanket rule AND MAKE any consequential amendments. Stock Exclusion AMEND to install more troughs where it is practical and likely to decrease stock from getting water within waterways. ADD a water testing system for each sub-catchment to monitor water quality. DELETE stock exclusion provisions from the plan entirely for the submitter's sub-catchment

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND MAKE any consequential amendments.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-1817	Support the provision with amendments	AMEND Rule 3.11.5.4 by removing the grandparenting approach from the plan. AMEND by providing a sub-catchment approach to address the contaminants that are relevant to each area rather than a blanket rule AND MAKE any consequential amendments. Stock Exclusion AMEND to install more troughs where it is practical and likely to decrease stock from getting water within waterways. ADD a water testing system for each sub-catchment to monitor water quality. DELETE stock exclusion provisions from the plan entirely for the submitters sub-catchment AND MAKE any consequential amendments.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-1819	Oppose the provision	AMEND 3.11.5.5 by removing the grandparenting approach from the plan. AMEND by providing a sub-catchment approach to address the contaminants that are relevant to each area rather than a blanket rule. AND any consequential amendments.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-1822	Oppose the provision	AMEND Rule 3.11.5.6 by removing the grandparenting approach from the plan. AMEND by providing a sub-catchment approach to address the contaminants that are relevant to each area rather than a blanket rule. AND MAKE any consequential amendments.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-1823	Oppose the provision	AMEND Rule 3.11.5.7 by removing the grandparenting approach from the plan. AMEND by providing a sub-catchment approach to address the contaminants that are relevant to each area rather than a blanket rule AND MAKE any consequential amendments.
Schedule B - Nitrogen Reference Point	PC1-1824	Oppose the provision	AMEND Schedule B by removing the grandparenting approach from the plan. AMEND by providing a sub-catchment approach to address the contaminants that are relevant to each area rather than a blanket rule. AND any consequential amendments.

## Scott, Peter Thomas

Submitter ID: 73986

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-10886	Support the provision with amendments	AMEND PPC1 by implementing a joint system where if an effluent system is inadequate the landowner is charged for more frequent visits, and if it is of good standard the visits are less frequent and free.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-10652	Oppose the provision with amendments	REMOVE Rule 3.11.5.2 regulation of cropping areas AND AMEND to require the 5 metre setback for active waterways only, and not for farm drains.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-10651	Oppose the provision with amendments	AMEND Rule 3.11.5.7 to allow land use change without a resource consent.
Schedule B - Nitrogen Reference Point	PC1-10656	Oppose the provision	No specific decision sought for Schedule B.

## Scott, Shirley

Submitter ID: 73939

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 5: Staged approach	PC1-5221	Oppose the provision	DELETE Policy 5 in its entirety. If not deleted then AMEND to provide for the staged approach to occur over a longer period, such as 30 years.
Schedule B - Nitrogen Reference Point	PC1-5218	Oppose the provision	DELETE Schedule B in its entirety.
Schedule C - Stock exclusion	PC1-5219	Oppose the provision	AMEND Schedule C to provide for troughs instead of expensive fencing.

## Self, John Owen

Submitter ID: 71295

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-2887	Oppose the provision	DELETE PPC1.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-2888	Oppose the provision	No specific decision requested for Rule 3.11.5.7.

## Sellars, Michael David and Alison Jean

Submitter ID: 72401

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-9164	Support the provision with amendments	No specific relief sought for PPC1.
Vision and Strategy for the Waikato River	PC1-9165	Oppose the provision with amendments	AMEND PPC1 to provide rules for the 80-year timeframe. OR AMEND PPC1 to reflect the 10 year rule duration proposed.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-9175	Support the provision with amendments	AMEND Rule 3.11.5.1 permitted stocking rates to be based on the carrying capacity of the land AND AMEND so the situation of leased grazed land is regulated in such a way that the land owner is not penalised because the lessee's operation operates over more than one property AND AMEND Rule 3.11.5.1 to provide consistency about the rules for grazing of slopes across the different rules for properties of different size (note: this relates to consistency, not actual slope) AND ADD a definition for grazed land to read: <u>A property on which grazing takes place not limited to the area of the property which is actually grazed.</u>
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-9177	Support the provision with amendments	AMEND Rule 3.11.5.2 to provide consistency about the rules for grazing of slopes. AND DELETE and adopt the slope's suitability for grazing as provided by the Land Use Capability Framework. AND AMEND Rule 3.11.5.2.3a so the situation of leased grazed land is regulated in such a way that the land owner is not penalised because the lessee's operation operates over more than one property.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-9178	Support the provision with amendments	AMEND Rule 3.11.5.3 to provide consistency about the rules for grazing of slopes.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-9276	Oppose the provision	AMEND Rule 3.11.5.7 to ensure changes of land use within a Land Use Capability classification to be permitted especially in relation to food production.
Schedule 1 - Requirements for Farm Environment Plans	PC1-9166	Support the provision with amendments	AMEND Schedule 1 to define how Farm Environment Plans will be actively policed, and what enforcement measures will be used
Schedule 1 - Requirements for Farm Environment Plans	PC1-12511	Support the provision with amendments	AMEND Schedule 1 to provide consistency about the rules for grazing of slopes.
Additions to Glossary of Terms	PC1-9170	Support the provision with amendments	ADD a definition for 'grazed land': " <u>A property on which grazing takes place not limited to the area of the property which is actually grazed.</u> " AND AMEND to provide clear definition of stocking rate.
Definition - Stock unit	PC1-9179	Oppose the provision with amendments	AMEND the Definition of 'Stock Units' to use a system of assessing impacts of stock carried.

## Shabor Ltd

Submitter ID: 71400

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-1253	Not stated	No specific decision sought for PPC1.
Objective 1: Long-term restoration and protection of water quality for	PC1-1106	Support the provision with amendments	AMEND Objective 1 to provide farmers with certainty beyond 10 years of PPC1 AND AMEND to conduct a full land use study that covers the full 80 years.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
each sub-catchment and Freshwater Management Unit			
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-1112	Support the provision with amendments	AMEND to provide a long term projection of the impact of PPC1 on the people and communities and amendments after the submission process.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-1126	Oppose the provision	DELETE Policy 1 Nitrogen Reference Point provisions, but if not deleted then AMEND to allocate all drystock farms around 25 kg Nitrogen /hectare/year [25 units of nitrogen]. AND AMEND to make better use of Farm Environment Plans.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-1127	Oppose the provision	DELETE Policy 2 Nitrogen Reference Point provisions, but if not deleted then AMEND to allocate all drystock farms around 25 kg Nitrogen /hectare/year [25 units of nitrogen].
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12907	Oppose the provision	AMEND Policy 2 to make better use of Farm Environment Plans.
Policy 5: Staged approach	PC1-1107	Support the provision with amendments	AMEND Policy 5 to provide farmers with certainty beyond the 10 years of PPC1 AND AMEND to conduct a full land use study that covers the full 80 years.
Policy 6: Restricting land use change	PC1-1108	Oppose the provision with amendments	DELETE Policy 6 provisions that restrict land use change in its entirety. AND CONSIDER Land Use Capability or natural capital approach as a method of assessing land use.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-1111	Support the provision with amendments	AMEND Policy 9 to provide for all rules that relate to farm level are amended to a sub-catchment approach with any consequential amendments arising from the submission process.
3.11.4.3 Farm Environment Plans	PC1-1101	Support the provision with amendments	AMEND Method 3.11.4.3 to provide for longer timeframes to complete Farm Environment Plans.
3.11.4.5 Sub-catchment scale planning	PC1-1110	Support the provision with amendments	AMEND 3.11.4.5 to provide for all rules that relate to farm level are amended to a sub-catchment approach with any consequential amendments arising from the submission process.
3.11.5 Rules	PC1-1244	Support the provision with amendments	AMEND Rules 3.11.5 to provide for all rules that relate to farm level are amended to a sub-catchment approach with any consequential amendments arising from the submission process.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-1114	Support the provision with amendments	AMEND (Rule 3.11.5.1) Schedule C to change the stock exclusion rules to the National Water Accord and the National Regulations for Stock Exclusion.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-1123	Support the provision with amendments	AMEND Rule 3.11.5.2 to change the stock exclusion rules to the National Water Accord and the National Regulations for Stock Exclusion. DELETE Rule 3.11.5.2 Nitrogen Reference Point provisions, but if not deleted then AMEND to allocate all drystock farms around 25 kg Nitrogen /hectare/year [25 units of nitrogen]. AND AMEND to make better use of Farm Environment Plans.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-1124	Support the provision with amendments	AMEND to change the stock exclusion rules to the National Water Accord rules and the National Regulations for Stock Exclusion.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			DELETE Rule 3.11.5.3 Nitrogen Reference Point provisions, but if not deleted then AMEND to allocate all drystock farms around 25 kg Nitrogen /hectare/year [25 units of nitrogen]. AND AMEND to make better use of Farm Environment Plans.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-1125	Support the provision with amendments	AMEND Rule 3.11.5.4 to change the stock exclusion rules to the National Water Accord and the National Regulations for Stock Exclusion. DELETE Nitrogen Reference Point provisions, but if not deleted then AMEND to allocate all drystock farms around 25 kg Nitrogen /hectare/year [25 units of nitrogen]. AND AMEND to make better use of Farm Environment Plans.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-1245	Support the provision with amendments	AMEND Rule 3.11.5.6 to change the stock exclusion rules to the National Water Accord and the National Regulations for Stock Exclusion.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13093	Oppose the provision with amendments	DELETE Rule 3.11.5.6 Nitrogen Reference Point provisions, but if not deleted then AMEND to allocate all drystock farms around 25 kg Nitrogen /hectare/year [25 units of nitrogen]. AND AMEND to make better use of Farm Environment Plans.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-1109	Oppose the provision	DELETE Rule 3.11.5.7 provisions that restrict land use change in its entirety. AND CONSIDER Land Use Capability or natural capital approach as a method of assessing land use.
Schedule B - Nitrogen Reference Point	PC1-1128	Oppose the provision	DELETE Schedule B Nitrogen Reference Point provisions, but if not deleted AMEND to allocate all drystock farms around 25 kg Nitrogen /hectare/year [25 units of nitrogen]. AND AMEND to make better use of Farm Environment Plans.
Schedule C - Stock exclusion	PC1-1113	Support the provision with amendments	AMEND Schedule C to change the stock exclusion rules to the National Water Accord and the National Regulations for Stock Exclusion.
Schedule 1 - Requirements for Farm Environment Plans	PC1-1104	Support the provision with amendments	AMEND Schedule 1 to provide for longer timeframes to complete Farm Environment Plans.

## Sharp, John & Leandre

Submitter ID: 71255

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-263	Oppose the provision	AMEND Schedule B to extend the 2 year average to 5 years.

## Sharp, Robert Malcolm

Submitter ID: 73455

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-9101	Oppose the provision	DELETE Rule 3.11.5.7. AND CONSIDER PPC1 that any restrictions associated with land use change need to be looked at as a total human impact across the entire catchment.
Schedule B - Nitrogen Reference Point	PC1-9099	Oppose the provision	DELETE from Schedule B any form of grandparenting. AND AMEND to allocate nitrogen discharge allowance on a per hectare basis relevant to, but not limited to, the following: soil type, topography, drainage, rainfall, and should be calculated on an input basis.
Schedule C - Stock exclusion	PC1-9100	Oppose the provision	AMEND Schedule C to include in the stock exclusion requirements provisions to address adverse events, animal welfare, health and safety, the impracticalities of stock exclusion and fencing and sediment removal.

## Shaw and Hall, Leigh Michael and Bradley John

Submitter ID: 73858

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-2583	Support the provision with amendments	RETAIN Objective 6 as proposed AND RETAIN Policy 15 AND AMEND Policy 15 to be holistic and include all sources influencing the health and well-being of the Waikato River and its catchments, especially pest fish species, in relation to sub-catchment management AND RETAIN working with others under Method 3.11.4.4 AND RETAIN Method 3.11.4.4(d) AND AMEND PPC1 to ADD new policies, objectives and rules that manage pest weeds and fish throughout the Waikato and Waipā Catchments.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-2566	Support the provision with amendments	RETAIN Objective 1 regarding long term restoration and protection of water quality for the Waikato and Waipā Rivers. AND AMEND PPC1 to be holistic and include all sources influencing the health and well-being of the Waikato River and its catchments AND DELETE flood/high flow conditions from water quality target data AND AMEND to address contaminants on a sub-catchment basis, to enable targeting of the highest discharging sub-catchments.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-2571	Support the provision with amendments	WITHDRAW PPC1 until the withdrawn area and the Vision and Strategy have been amended. AND CONSIDER undertaking a section 32 analysis to investigate the revised impact PPC1 could have on society and the economy. AND RETAIN maintenance of long-term social, economic and cultural well-being of the Waikato and Waipā Catchment communities. AND DELETE Nitrogen Reference Points from the rules.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan to align with the intention of Objective 2</p> <p>AND AMEND to address contaminants on a sub-catchment basis, to enable targeting of the highest discharging sub-catchments.</p> <p>AND AMEND to include robust indicators to measure social, economic and cultural well-being.</p>
Objective 3: 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	PC1-2575	Support the provision with amendments	<p>RETAIN 10% achievement of the long-term water quality targets set out in PPC1 by 2026</p> <p>AND DELETE Nitrogen Reference Points from the rules</p> <p>AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment</p> <p>AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.</p>
Objective 4: People and community resilience	PC1-2577	Support the provision with amendments	<p>RETAIN a staged approach in Objective 4.</p> <p>AND DELETE Nitrogen Reference Point rules and land use change restrictions.</p> <p>AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.</p> <p>AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.</p>
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-2582	Support the provision with amendments	AMEND PPC1 to acknowledge primary production as a core value to reflect Mana Tangata.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-2584	Support the provision with amendments	AMEND the rules in PPC1 to reflect Policy 1.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12650	Support the provision with amendments	AMEND Policy 1 to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12651	Support the provision with amendments	<p>AMEND Policy 1(c) to read as follows: "<u>Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes 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 Policy 1(d) to read as follows: "<u>d. 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 CLARIFY how slope is measured where topography ranges.</p>
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12652	Support the provision with amendments	RETAIN Policy 1 management of diffuse discharges and water quality on a sub-catchment basis.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-2608	Support the provision with amendments	AMEND PPC1 to reflect Policy 2 [1] in adopting a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12909	Support the provision with amendments	RETAIN appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12908	Oppose the provision	Policy 2 - DELETE Nitrogen Reference Point rules.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-2610	Support the provision with amendments	RETAIN Policy 3 allowing for flexibility to undertake commercial vegetable production while reducing average contaminant discharges over time AND DELETE Nitrogen Reference Point rules AND CLARIFY how commercial vegetable production enterprises that implement best practice measures to reduce discharges will be enabled by PPC1.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-2612	Support the provision with amendments	AMEND Policy 4 to REMOVE signalling of future mitigation action requirements. AND RETAIN provisions allowing for low-intensity land uses to continue and to establish.
Policy 5: Staged approach	PC1-2616	Support the provision with amendments	RETAIN Policy 5. Policy 5: DELETE the Nitrogen Reference Point rules AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.
Policy 6: Restricting land use change	PC1-2617	Oppose the provision	AMEND Policy 6 so that land use change in high priority sub-catchments is a Restricted Discretionary Activity AND AMEND Policy 6 so that land use change in a low priority sub-catchment is a Permitted Activity AND ADOPT a sub-catchment management approach in PPC1 to ensure collaborative and fair management of resources within each sub-catchment AND AMEND to enable appropriate mitigation strategies to be adopted through a tailored Farm Environment Plan.
Policy 7: Preparing for allocation in the future	PC1-2618	Support the provision with amendments	RETAIN Policy 7 reducing diffuse discharges while considering land suitability. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan. AND ENSURE that Waikato Regional Council works collaboratively with stakeholder groups to develop sub-catchment approaches.
Policy 8: Prioritised implementation	PC1-2621	Support the provision	RETAIN Policy 8.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-2622	Support the provision	RETAIN Policy 9 regarding managing water quality at a sub-catchment level. AND AMEND Rules to reflect Policy 9

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to enable appropriate mitigation strategies to be developed in the context of water quality gains to be made through a tailored Farm Environment Plan.
Policy 10: Provide for point source discharges of regional significance	PC1-2623	Support the provision with amendments	RETAIN the consideration of the regional significance of point source discharges of infrastructure and industry. Policy 10 AND AMEND PPC1 to take a holistic approach that includes all sources influencing the health and well-being of the Waikato River and its catchments. AND AMEND to recognise that Class I, II and III soils are scarce and the climate of the Franklin area means it is a regionally significant food-producing area. AND AMEND to adopt a sub-catchment approach to ensure collaborative and fair management of resources within each sub-catchment.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-2624	Support the provision with amendments	AMEND Policy 11 to ensure that all stakeholders adopt the Best Practicable Option. AND AMEND to clarify 'significant toxic adverse effect'. AND AMEND the rules to reflect Policy 11.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-2625	Support the provision with amendments	RETAIN Policy 12 considering past technology upgrades and costs associated with upgrades. AND AMEND to ADOPT a sub-catchment approach to ensure collaborative and fair management of resources within the region. AND AMEND PPC1 to ensure that Policy 12 applies to all discharges affecting the health and well-being of the Waikato and Waipā Rivers.
Policy 13: Point sources consent duration	PC1-2626	Support the provision with amendments	RETAIN Policy 13(b) and AMEND to include all property owners and enterprises in the Waikato and Waipā River catchments.
Policy 14: Lakes Freshwater Management Units	PC1-2628	Support the provision	RETAIN Policy 14.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-2629	Support the provision with amendments	RETAIN Policy 16. AND AMEND PPC1 to ADD a rule to support Policy 16. AND AMEND to consider flexibility for all landowners.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-2630	Support the provision with amendments	WITHDRAW PPC1 until the withdrawn area and the Vision and Strategy have been amended. AND RETAIN Policy 17.
3.11.4.1 Working with others	PC1-2631	Support the provision	RETAIN Method 3.11.4.1.
3.11.4.2 Certified Industry Scheme	PC1-2632	Support the provision	RETAIN Method 3.11.4.2.
3.11.4.3 Farm Environment Plans	PC1-2633	Support the provision with amendments	RETAIN Farm Environment Plans in Method 3.11.4.3 AND AMEND to enable land users that are capable and experienced to become accredited through a certified industry scheme to develop their own Farm Environment Plans according to a template.
3.11.4.5 Sub-catchment scale planning	PC1-2638	Support the provision with amendments	RETAIN Method 3.11.4.5, AND AMEND PPC1 so that the rules reflect Method 3.11.4.5
3.11.4.6 Funding and implementation	PC1-2641	Support the provision	RETAIN Method 3.11.4.6.
3.11.4.7 Information needs to support any future allocation	PC1-2642	Support the provision with amendments	RETAIN the gathering of information. 3.11.4.7 AND AMEND PPC1 to enable management of diffuse discharges on a sub-catchment basis.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-2644	Support the provision with amendments	RETAIN the gathering of information. 3.11.4.8 AND AMEND PPC1 to enable management of diffuse discharges on a sub-catchment basis.
3.11.4.9 Managing the effects of urban development	PC1-2645	Support the provision	RETAIN Method 3.11.4.9.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-2646	Support the provision	RETAIN Method 3.11.4.12.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-2656	Support the provision	RETAIN enabling low-intensity land uses to continue and establish as a Permitted Activity AND AMEND Rule 3.11.5.1(2) to read as follows: "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" AND CLARIFY how and where to measure slope on undulating land.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-2658	Support the provision with amendments	RETAIN Rule 3.11.5.2 the Permitted Activity status for low-intensity land uses AND AMEND stock exclusion provisions to read as follows: "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 <del>Conditions 3(e) and 4(e) of this rule</del> ; and" AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan AND AMEND Rule 3.11.5.2 to read as follows: "The use of 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 area is greater than 4.1 hectares and has more than 6 stock units per hectare, <u>but less than 18 stock units per hectare</u> , or is used for arable cropping, is a permitted activity subject to the following conditions." AND DELETE Nitrogen Reference Points from the rules AND DELETE Rule 3.11.5.2(3)(b)i AND CLARIFY stock exclusion requirements.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-2663	Support the provision with amendments	RETAIN Farm Environment Plans, Certified Industry Schemes and stock exclusion where practical. AND DELETE Nitrogen Reference Points from the rules AND AMEND Rule 3.11.5.3(3) to read as follows: "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 AMEND to address contaminants on a sub-catchment basis, to enable targeting of the highest discharging sub-catchments AND CLARIFY stock exclusion requirements AND CLARIFY the length of time a Farm Environment Plan is valid.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm	PC1-2665	Support the provision with amendments	RETAIN Rule 3.11.5.4 Farm Environment Plans, Certified Industry Schemes and stock exclusion where practical AND DELETE Nitrogen Reference Points from the rules

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Environment Plan not under a Certified Industry Scheme			AND AMEND to address contaminants on a sub-catchment basis, to enable targeting of the highest discharging sub-catchments AND AMEND to ensure that resource consent duration is 15 years or more AND CLARIFY stock exclusion requirements. AND CLARIFY the length of time a Farm Environment Plan is valid.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-2666	Oppose the provision	AMEND Rule 3.11.5.7 to address contaminants on a sub-catchment basis, to enable targeting of the highest discharging sub-catchments AND AMEND so that land use change in high priority sub-catchments is a Restricted Discretionary activity with discretion limited to the management of diffuse discharges of the four contaminants AND AMEND so that land use change in low priority areas is a Permitted Activity AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.
Schedule B - Nitrogen Reference Point	PC1-2667	Oppose the provision	DELETE Nitrogen Reference Points from PPC1.
Schedule C - Stock exclusion	PC1-2668	Support the provision with amendments	AMEND Schedule C to CLARIFY stock exclusion requirements. AND AMEND to CLARIFY the stock classes that are considered livestock.
Schedule 1 - Requirements for Farm Environment Plans	PC1-2669	Oppose the provision with amendments	DELETE (Schedule 1) Nitrogen Reference Point provisions.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-2674	Oppose the provision	AMEND the attribute targets to align with the National Policy Statement for Freshwater Management.
Definition - Nitrogen Reference Point	PC1-2676	Oppose the provision	DELETE Nitrogen Reference Point provisions.

## Sherlock, Jon and Fiona

Submitter ID: 73847

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-5030	Oppose the provision	No specific decision sought for PPC1.
Full achievement of the Vision and Strategy will be intergenerational	PC1-11517	Oppose the provision with amendments	DELETE the restriction of land use change from PPC1 AND AMEND so that farmers are able to manage or amend the Farm Environment Plan, with this being audited only.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-5031	Oppose the provision	WITHDRAW PPC1 and RE-NOTIFY once there is clear indication of future rules AND AMEND to make PPC1 less onerous on hill county farmers until future requirements become clear. For instance, only require stock to be excluded from slopes less than 15 degrees, as per the National Policy Statement for Freshwater Management AND REMOVE the grandparenting approach AND AMEND so that nitrogen is investigated at a sub-catchment level

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to set a band that all dischargers have to adhere to, that is equitable for all low and high dischargers AND AMEND PPC1 to include rules to control koi carp.
Objective 3: 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	PC1-5034	Oppose the provision	WITHDRAW PPC1 and RE-NOTIFY once there is clear indication of future rules AND AMEND to make PPC1 less onerous on hill county farmers until future requirements become clear. For instance, only require stock to be excluded from slopes less than 15 degrees, as per the National Policy Statement for Freshwater Management AND AMEND PPC1 to include rules to control koi carp.
Objective 4: People and community resilience	PC1-5035	Oppose the provision	WITHDRAW PPC1 and RE-NOTIFY once there is clear indication of future rules AND AMEND to make PPC1 less onerous on hill county farmers until future requirements become clear. For instance, only require stock to be excluded from slopes less than 15 degrees, as per the National Policy Statement for Freshwater Management REMOVE the grandparenting approach AND AMEND so that nitrogen is investigated at a sub-catchment level AND AMEND to set a band that all dischargers have to adhere to, that is equitable for all low and high dischargers.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-5347	Support the provision with amendments	AMEND PPC1 to include rules to control koi carp.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12910	Support the provision with amendments	AMEND Policy 2 so that farmers are able to manage or amend the Farm Environment Plan, with this being audited only.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12911	Support the provision with amendments	AMEND PPC1 to include rules to control koi carp.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-5037	Oppose the provision with amendments	REMOVE the grandparenting approach AND AMEND so that nitrogen is investigated at a sub-catchment level AND AMEND to set a band that all dischargers have to adhere to, that is equitable for all low and high dischargers.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-5348	Support the provision with amendments	AND AMEND PPC1 to include rules to control koi carp.
Policy 5: Staged approach	PC1-5036	Oppose the provision	WITHDRAW PPC1 and RE-NOTIFY once there is clear indication of future rules AND AMEND to make PPC1 less onerous on hill county farmers until future requirements become clear. For instance, only require stock to be excluded from slopes less than 15 degrees, as per the National Policy Statement for Freshwater Management.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 6: Restricting land use change	PC1-5344	Oppose the provision	DELETE Policy 6.
Policy 7: Preparing for allocation in the future	PC1-5038	Oppose the provision	WITHDRAW PPC1 and RE-NOTIFY once there is clear indication of future rules AND AMEND to make PPC1 less onerous on hill county farmers until future requirements become clear. For instance, only require stock to be excluded from slopes less than 15 degrees, as per the National Policy Statement for Freshwater Management AND REMOVE the grandparenting approach AND AMEND so that nitrogen is investigated at a sub-catchment level AND AMEND to set a band that all dischargers have to adhere to, that is equitable for all low and high dischargers AND AMEND PPC1 to include rules to control koi carp.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-5369	Support the provision with amendments	AMEND Policy 9 to allow for an individual sub-catchment approach in the rules.
3.11.4.1 Working with others	PC1-5370	Support the provision with amendments	AMEND Method 3.11.4.1 to allow for an individual sub-catchment approach in the rules.
3.11.4.5 Sub-catchment scale planning	PC1-5371	Support the provision with amendments	AMEND Method 3.11.4.5 to allow for an individual sub-catchment approach in the rules.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-5047	Support the provision with amendments	AMEND Rule 3.11.5.1 to align the stock exclusion standard in PPC1 with the National Policy Statement for Freshwater Management criteria AND AMEND so that stock exclusion only applies to streams up to a gradient of 15 degrees and with a 1 metre setback.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-5343	Support the provision with amendments	AMEND Rule 3.11.5.2 to align the stock exclusion standard in PPC1 with the National Policy Statement for Freshwater Management criteria AND AMEND so that stock exclusion only applies to streams up to a gradient of 15 degrees and with a 1 metre setback.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-5039	Oppose the provision	WITHDRAW PPC1 and RE-NOTIFY once there is clear indication of future rules AND AMEND to make PPC1 less onerous on hill county farmers until future requirements become clear. For instance, only require stock to be excluded from slopes less than 15 degrees, as per the National Policy Statement for Freshwater Management AND REMOVE the grandparenting approach AND AMEND so that nitrogen is investigated at a sub-catchment level AND AMEND to set a band that all dischargers have to adhere to, that is equitable for all low and high dischargers AND AMEND Rule 3.11.5.3 to align the stock exclusion standard in PPC1 with the National Policy Statement for Freshwater Management criteria AND AMEND so that stock exclusion only applies to streams up to a gradient of 15 degrees and with a 1 metre setback. AND AMEND Rule 3.11.5.3 so that farmers are able to manage or amend the Farm Environment Plan, with this being audited only AND AMEND PPC1 to include rules to control koi carp.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-5040	Oppose the provision	WITHDRAW PPC1 and RE-NOTIFY once there is clear indication of future rules AND AMEND to make PPC1 less onerous on hill county farmers until future requirements become clear. For instance, only require stock to be excluded from slopes less than 15 degrees, as per the National Policy Statement for Freshwater Management AND REMOVE the grandparenting approach AND AMEND so that nitrogen is investigated at a sub-catchment level AND AMEND to set a band that all dischargers have to adhere to, that is equitable for all low and high dischargers AND AMEND Rule 3.11.5.4 to align the stock exclusion standard in PPC1 with the National Policy Statement for Freshwater Management criteria AND AMEND so that stock exclusion only applies to streams up to a gradient of 15 degrees and with a 1 metre setback. AND AMEND Rule 3.11.5.4 so that farmers are able to manage or amend the Farm Environment Plan, with this being audited only AND AMEND PPC1 to include rules to control koi carp.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-5042	Oppose the provision	WITHDRAW PPC1 and RE-NOTIFY once there is clear indication of future rules AND AMEND to make PPC1 less onerous on hill county farmers until future requirements become clear. For instance, only require stock to be excluded from slopes less than 15 degrees, as per the National Policy Statement for Freshwater Management AND REMOVE the grandparenting approach from PPC1 AND AMEND so that nitrogen is investigated at a sub-catchment level AND AMEND to set a band that all dischargers have to adhere to, that is equitable for all low and high dischargers AND AMEND so that farmers are able to manage or amend the Farm Environment Plan, with this being audited only AND AMEND PPC1 to include rules to control koi carp.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-5043	Oppose the provision	REMOVE the grandparenting approach from PPC1 AND AMEND so that nitrogen is investigated at a sub-catchment level AND AMEND to set a band that all dischargers have to adhere to, that is equitable for all low and high dischargers.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13094	Support the provision with amendments	AMEND Rule 3.11.5.6 so that farmers are able to manage or amend the Farm Environment Plan, with this being audited only.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13095	Support the provision with amendments	AMEND PPC1 to include rules to control koi carp.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-5045	Oppose the provision	DELETE Rule 3.11.5.7 If not deleted, then REMOVE the grandparenting approach from PPC1 AND AMEND so that nitrogen is investigated at a sub-catchment level



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to set a band that all dischargers have to adhere to, that is equitable for all low and high dischargers AND AMEND Rule 3.11.5.7 so that farmers are able to manage or amend the Farm Environment Plan, with this being audited only AND AMEND PPC1 to include rules to control koi carp.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12512	Oppose the provision	AMEND Schedule 1 to make PPC1 less onerous on hill county farmers until future requirements become clear. For instance, only require stock to be excluded from slopes less than 15 degrees, as per the National Policy Statement for Freshwater Management.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12513	Oppose the provision	REMOVE the grandparenting approach from PPC1 AND AMEND so that nitrogen is investigated at a sub-catchment level AND AMEND to set a band that all dischargers have to adhere to, that is equitable for all low and high dischargers.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12514	Support the provision with amendments	AMEND Schedule 1 so that farmers are able to manage or amend the Farm Environment Plan, with this being audited only.
Schedule 1 - Requirements for Farm Environment Plans	PC1-5046	Oppose the provision	WITHDRAW PPC1 and RE-NOTIFY once there is clear indication of future rules.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-5349	Support the provision with amendments	AMEND PPC1 to include rules to control koi carp.

## Sherlock, Richard

Submitter ID: 60407

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-10367	Support the provision with amendments	No specific decision sought for PPC1.
Background and explanation	PC1-10368	Support the provision with amendments	DELETE reference to land use change restrictions in 3.11 Background and explanation, pages 15-16 AMEND 3.11 Background and explanation pages 15-16 to enable farmers to manage or change the Farm Environment Plan with this being audited only.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-10369	Oppose the provision with amendments	WITHDRAW PPC1 and re-notify once there is a clear indication of future rules AND AMEND Objective 1 to remove the grandparenting approach AND AMEND to manage nitrogen emissions at a sub-catchment scale, with levels set according to the sub-catchment issue AND AMEND to set an emission range for all properties to ensure equity across all emitters AND AMEND Objective 1 so that PPC1 provisions manage all factors which affect water quality.
Objective 3: Short-term improvements in water quality in the	PC1-10370	Oppose the provision with amendments	WITHDRAW PPC1 and re-notify once there is a clear indication of future rules AND AMEND Objective 3 so that PPC1 provisions manage all factors which affect water quality.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit			
Objective 4: People and community resilience	PC1-10371	Oppose the provision	WITHDRAW PPC1 and re-notify once there is a clear indication of future rules AND AMEND Objective 4 to remove the grandparenting approach AND AMEND to manage nitrogen emissions at a sub-catchment scale, with levels set according to the sub-catchment issue AND AMEND to set an emission range for all properties to ensure equity across all emitters.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-10372	Support the provision with amendments	AMEND Policy 1 so that PPC1 provisions manage all factors which affect water quality.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-10373	Oppose the provision with amendments	AMEND Policy 2 to remove the grandparenting approach AND AMEND to manage nitrogen emissions at a sub-catchment scale, with levels set according to the sub-catchment issue AND AMEND to set an emission range for all properties to ensure equity across all emitters.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12912	Support the provision with amendments	AMEND Policy 2 to enable farmers to manage or change the Farm Environment Plan with this being audited only.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12913	Support the provision with amendments	AMEND Policy 2 so that PPC1 provisions manage all factors which affect water quality.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-10374	Support the provision with amendments	AMEND Policy 4 so that PPC1 provisions manage all factors which affect water quality.
Policy 5: Staged approach	PC1-10375	Oppose the provision	WITHDRAW PPC1 and re-notify once there is a clear indication of future rules.
Policy 6: Restricting land use change	PC1-10376	Oppose the provision	DELETE Policy 6 in its entirety.
Policy 7: Preparing for allocation in the future	PC1-10377	Oppose the provision with amendments	WITHDRAW PPC1 and re-notify once there is a clear indication of future rules AND AMEND Policy 7 to remove the grandparenting approach AND AMEND to manage nitrogen emissions at a sub-catchment scale, with levels set according to the sub-catchment issue AND AMEND to set an emission range for all properties to ensure equity across all emitters AND AMEND Policy 7 so that PPC1 provisions manage all factors which affect water quality.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-10378	Support the provision with amendments	AMEND Policy 9 to better support an individual sub-catchment approach.
3.11.4.1 Working with others	PC1-10379	Support the provision with amendments	AMEND Method 3.11.4.1 to better support an individual sub-catchment approach.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.4.5 Sub-catchment scale planning	PC1-10380	Support the provision with amendments	AMEND Method 3.11.4.5 to better support an individual sub-catchment approach.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-10381	Support the provision with amendments	AMEND Rule 3.11.5.1 to adopt the National Policy Statement for Freshwater Management as the standard AND AMEND to allow for alternative stock exclusion measures that achieve the same or an acceptable result.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-10382	Support the provision with amendments	AMEND Rule 3.11.5.2 to adopt the National Policy Statement for Freshwater Management as the standard AND AMEND to allow for alternative stock exclusion measures that achieve the same or an acceptable result.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-10383	Support the provision with amendments	WITHDRAW PPC1 and re-notify once there is a clear indication of future rules AND AMEND Rule 3.11.5.3 to remove the grandparenting approach AND AMEND to manage nitrogen emissions at a sub-catchment scale, with levels set according to the sub-catchment issue AND AMEND to set an emission range for all properties to ensure equity across all emitters AND AMEND Rule 3.11.5.3 to adopt the National Policy Statement for Freshwater Management as the standard AND AMEND to allow for alternative stock exclusion measures that achieve the same or an acceptable result AND AMEND Rule 3.11.5.3 to enable farmers to manage or change the Farm Environment Plan with this being audited only AND AMEND Rule 3.11.5.3 so that PPC1 provisions manage all factors which affect water quality.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-10384	Support the provision with amendments	WITHDRAW PPC1 and re-notify once there is a clear indication of future rules AND AMEND Rule 3.11.5.4 to remove the grandparenting approach AND AMEND to manage nitrogen emissions at a sub-catchment scale, with levels set according to the sub-catchment issue AND AMEND to set an emission range for all properties to ensure equity across all emitters AND AMEND Rule 3.11.5.4 to adopt the National Policy Statement for Freshwater Management as the standard AND AMEND to allow for alternative stock exclusion measures that achieve the same or an acceptable result AND AMEND Rule 3.11.5.4 to enable farmers to manage or change the Farm Environment Plan with this being audited only AND AMEND Rule 3.11.5.4 so that PPC1 provisions manage all factors which affect water quality.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-10385	Oppose the provision	WITHDRAW PPC1 and re-notify once there is a clear indication of future rules AND AMEND Rule 3.11.5.5 to remove the grandparenting approach AND AMEND to manage nitrogen emissions at a sub-catchment scale, with levels set according to the sub-catchment issue AND AMEND to set an emission range for all properties to ensure equity across all emitters AND AMEND Rule 3.11.5.5 to enable farmers to manage or change the Farm Environment Plan with this being audited only AND AMEND Rule 3.11.5.5 so that PPC1 provisions manage all factors which affect water quality.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-10386	Oppose the provision with amendments	AMEND Rule 3.11.5.6 to remove the grandparenting approach AND AMEND to manage nitrogen emissions at a sub-catchment scale, with levels set according to the sub-catchment issue AND AMEND to set an emission range for all properties to ensure equity across all emitters.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13096	Support the provision with amendments	AMEND Rule 3.11.5.6 to enable farmers to manage or change the Farm Environment Plan with this being audited only.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13097	Support the provision with amendments	AMEND Rule 3.11.5.6 so that PPC1 provisions manage all factors which affect water quality.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-10387	Oppose the provision with amendments	DELETE Rule 3.11.5.7 in its entirety.
Schedule C - Stock exclusion	PC1-10388	Support the provision with amendments	AMEND Schedule C to adopt the National Policy Statement for Freshwater Management as the standard AND AMEND to allow for alternative stock exclusion measures that achieve the same or an acceptable result.
Schedule 1 - Requirements for Farm Environment Plans	PC1-10390	Oppose the provision with amendments	WITHDRAW PPC1 and re-notify once there is a clear indication of future rules.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12515	Oppose the provision with amendments	AMEND Schedule 1 to remove the grandparenting approach AND AMEND to manage nitrogen emissions at a sub-catchment scale, with levels set according to the sub-catchment issue AND AMEND to set an emission range for all properties to ensure equity across all emitters.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12516	Oppose the provision with amendments	AMEND Schedule 1 to enable farmers to manage or change the Farm Environment Plan with this being audited only.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-10391	Support the provision with amendments	AMEND Table 3.11-1 so that PPC1 provisions manage all factors which affect water quality.

## Sherrard, Samuel John

Submitter ID: 71431

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-1284	Oppose the provision	AMEND PPC1 to include a well-constructed nitrogen trading scheme.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-1285	Oppose the provision	AMEND Rule 3.11.5.7 as per nitrogen number Trading Scheme.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-1286	Oppose the provision	AMEND Schedule B to remove grandparenting allocation and reallocate all nitrogen loss numbers and include a nitrogen loss number trading scheme to be more equitable for all land and water users / owners.

## Sherriff and Tatham, Mathew and Kim

Submitter ID: 72508

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-5582	Oppose the provision	No specific decision sought for PPC1.
Vision and Strategy for the Waikato River	PC1-5597	Support the provision	RETAIN the Vision and Strategy as proposed AND CONSIDER a rewrite of PPC1.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-5599	Support the provision with amendments	AMEND Objective 1 to provide for the goal of swim ability and fish ability 365 days per year to be reduced, or modified to allow for winter and high water flow events, AND AMEND to provide for more modelling on different scenarios, AND AMEND to provide for testing to be done only after a certain number of dry days during the year when the rivers are being used, i.e October through to April.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-5598	Support the provision	RETAIN Objective 2 as proposed.
Objective 4: People and community resilience	PC1-5600	Support the provision with amendments	DELETE Objective 4, Part 4b.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-5601	Oppose the provision with amendments	DELETE Objective 5 Part b.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-5613	Support the provision with amendments	AMEND Policy 1 to provide for all aspects of the plan to come under Farm Environment Plans which should be developed using a sub-catchment approach.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12914	Oppose the provision	DELETE Policy 2 Part c.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12915	Oppose the provision	DELETE Policy 2 Part e.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-5615	Support the provision with amendments	AMEND Policy 2 to make better use of Farm Environment Plans and to develop individual plans for individual farms.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-5623	Oppose the provision	DELETE Policy 4 in its entirety.
Policy 5: Staged approach	PC1-5624	Support the provision	RETAIN Policy 5 as proposed.
Policy 6: Restricting land use change	PC1-5625	Oppose the provision	AMEND Policy 6 to use a more tailored approach, AND AMEND to include land use change in Farm Environment Plans linked to land classification units and on a sub-catchment basis.
Policy 7: Preparing for allocation in the future	PC1-5626	Support the provision with amendments	DELETE Policy 7 Part b.
Policy 8: Prioritised implementation	PC1-5627	Support the provision	RETAIN Policy 8 as proposed.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-5628	Support the provision	RETAIN Policy 9 as proposed.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-5629	Oppose the provision	DELETE Policy 16 in its entirety.
3.11.4 Implementation methods	PC1-5631	Support the provision with amendments	AMEND 3.11.4 Implementation Methods to provide for the development of a plan with buy in from farmers at a sub-catchment level to work out what is needed where and develop the plan around that, AND AMEND to ensure a funding plan is developed. Ensure the funds go back to help with mitigation controls and works, not into enforcement and policy making.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-5632	Support the provision with amendments	AMEND Rule 3.11.5.1 to ensure the drafting gate is lifted to a stocking rate of 8.5 stock units per hectare. AND AMEND to remove Clause 2 and replace with best practice.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-5644	Support the provision with amendments	AMEND Rule 3.11.5.2 to ensure contaminants are looked at on a sub-catchment level and contaminants are addressed according to what is needed AND AMEND to remove Clause 2 and replace with best practice AND AMEND to remove the word grazed in Clause 4(c) AND AMEND to change stock exclusion to best practice AND AMEND to provide for stock exclusion through Farm Environment Plans with reference back to the sub-catchment and what has been identified as the problems for that catchment such as fencing or water systems AND AMEND to remove the fencing requirement of land over 15 degrees. Use schedule C only as a guide when developing Farm Environment Plans.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm	PC1-5646	Support the provision with amendments	AMEND Rule 3.11.5.3 to remove the Nitrogen Reference Point as a farming limit, AND AMEND to ensure stock exclusion is based on best practice and different for each individual farm.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Environment Plan under a Certified Industry Scheme			
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-5647	Support the provision with amendments	AMEND Rule 3.11.5.4 to remove all reference of the Nitrogen Reference Point and stock exclusion, AND AMEND to relate the consent back to the Farm Environment Plan, which can cover off all of those issues, on sub-catchment by sub-catchment, farm by farm basis.
Schedule A - Registration with Waikato Regional Council	PC1-5648	Support the provision with amendments	AMEND Schedule A to ensure a date for stock numbers is set, AND DELETE Clause 6a (ii) & (iii), OR AMEND to relate back to a Farm Environment Plan, OR AMEND to apply to any major waterway.
Schedule B - Nitrogen Reference Point	PC1-5649	Oppose the provision	DELETE Schedule B in its entirety, AND ADD an approach to nutrient loss to focus on what are the issues for each sub-catchment and then at an on farm level, with the use of Farm Environment Plans and the land use capabilities.
Schedule C - Stock exclusion	PC1-5651	Oppose the provision	AMEND Schedule C to provide for stock exclusion through Farm Environment Plans with reference back to the sub-catchment and what has been identified as the problems for that catchment such as fencing or water systems, AND AMEND to remove the fencing requirement of land over 15 degrees. Use schedule C only as a guide when developing Farm Environment Plans.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12517	Support the provision with amendments	AMEND Schedule 1 to ensure Farm Environment Plans are used to determine where the important areas to focus on are along the lines of land use capabilities.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12518	Oppose the provision with amendments	DELETE Schedule 1, Clause 5 AND AMEND to provide a sub-catchment approach to work out in the catchments where the important areas are to focus on.
Schedule 1 - Requirements for Farm Environment Plans	PC1-5654	Oppose the provision with amendments	AMEND Schedule 1 to provide for stock exclusion through Farm Environment Plans with reference back to the sub-catchment and what has been identified as the problems for that catchment such as fencing or water systems, AND AMEND to remove the fencing requirement of land over 15 degrees.
Schedule 2 - Certification of Industry Schemes	PC1-6388	Support the provision	RETAIN Schedule 2.

## Shinarro Jerseys Ltd

Submitter ID: 71652

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7309	Oppose the provision	No specific decision requested for PPC1.

# Sieling Farms

Submitter ID: 73514

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-5454	Oppose the provision	WITHDRAW PPC1 until the Hauraki issues are resolved and further consultation with landowners has been undertaken.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-5456	Oppose the provision	AMEND Objective 1 to add " <u>The targets to be met shall not exceed the minimum standards or targets set by any current or subsequent National Policy Statement.</u> "
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-5462	Oppose the provision	AMEND Policy 2 to ensure Farm Environment Plans are only required for livestock farms running more than 20 SU/ha or greater than 50ha. AND AMEND to provide for an exemption for low intensity land use.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-5463	Oppose the provision	AMEND Policy 3 to add an exemption for low intensity and small scale enterprises.
Policy 6: Restricting land use change	PC1-5464	Oppose the provision	AMEND Policy 6 to provide for a like for like clause, where a landowner can replace for instance an existing forestry lot with a similar sized one somewhere else and return the original forestry area to pasture.
Policy 7: Preparing for allocation in the future	PC1-5465	Oppose the provision	DELETE Policy 7 in its entirety.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-5466	Oppose the provision	AMEND Policy 12 to add a clause (e) to read " <u>The relative cost of upgrading or replacing existing effluent storage systems versus the benefits achieved for the systems already show a reasonable degree of compliance.</u> " (or words to that effect).
3.11.4.1 Working with others	PC1-5467	Oppose the provision	AMEND Method 3.11.4.1 to include landowners as stakeholders.
3.11.4.3 Farm Environment Plans	PC1-5468	Oppose the provision	AMEND Method 3.11.4.3 to ensure Farm Environment Plans are only required when Waikato Regional Council can demonstrate that a property has a considerable contaminant discharge.
3.11.4.5 Sub-catchment scale planning	PC1-5469	Oppose the provision with amendments	AMEND Method 3.11.4.5 to read " <u>Waikato Regional Council will work with land owners.</u> "
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-5470	Oppose the provision	AMEND Rule 3.11.5.1 to read " <u>Domestic</u> cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C" AND AMEND to REMOVE clause 3 and the sentence prior to clause 5, also REMOVE " <del>Either</del> " above clause 3 and REMOVE clause 4 AND AMEND to provide for a stocking rate of 15 SU/ha AND AMEND clause 6 as follows: "No arable cropping occurs <u>other than regrassing; and</u> " AND AMEND to REMOVE Clause 7.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-5471	Oppose the provision	AMEND Rule 3.11.5.2 to remove " <del>where the property is greater than 4.1ha</del> " AND AMEND to provide for 15 stock units per hectare instead of 6



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND to read "<u>Domestic</u> cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C and conditions 3(e) and 4(e) of this rule"</p> <p>AND AMEND to provide for Clause 3 to be rewritten</p> <p>OR</p> <p>AND AMEND clause 3 to provide for 50ha instead of 20ha</p> <p>AND AMEND to DELETE Clause 3(a)</p> <p>AND AMEND Clause 3(e) to read "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 <u>domestic</u> cattle, horses, deer and pigs <del>cannot be within three metres</del> <u>can on average not be within 3 metres</u> of the bed of the water body"</p> <p>AND AMEND Clause 4 to provide for 50ha instead of 20ha</p> <p>AND AMEND clause 4b(ii) to read "<del>15kg</del>20kg nitrogen/hectare/year,"</p> <p>AND AMEND to DELETE Clause 4(c)</p> <p>AND AMEND Clause 4(e)(ii) to read "New fences installed after 22 October 2016 must be located to ensure <u>domestic</u> cattle, horses, deer and pigs <del>cannot be within three metres</del> <u>can on average not be within 3 metres</u> of the bed of the water body"</p> <p>AND AMEND to DELETE clause 5 and REPLACE with a contaminant output based criterion.</p>
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-5472	Oppose the provision	<p>AMEND Clause (3) of Rule 3.11.5.3 to read "<u>Domestic</u> cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C."</p> <p>AND AMEND to DELETE Clauses 5, 6, 7, and 8.</p>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-5473	Oppose the provision	DELETE Rule 3.11.5.4 and reconsider the criteria.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-5475	Oppose the provision	AMEND Rule 3.11.5.7 or address this elsewhere in the plan, to provide like for like swapping of activities on different areas as long as the increase in contaminant output is no more than minor.
Schedule A - Registration with Waikato Regional Council	PC1-5476	Oppose the provision	AMEND Schedule A to provide for the area to be increased to 10ha or more and select the at risk properties to be contacted from their database as their aerial photography will show most of the land-uses.
Schedule B - Nitrogen Reference Point	PC1-5477	Oppose the provision	<p>DELETE Clause g (iii &amp; iv) of Schedule B.</p> <p>Reconsider the use of the OVERSEER Model to address the problem that, if part of a farm gets sold which has forestry on it, nitrogen may exceeds the Nitrogen Reference Point for the rest of the property (without an actual increase in nitrogen discharge)?</p>
Schedule C - Stock exclusion	PC1-5479	Oppose the provision	<p>AMEND Schedule C to read "The water bodies must be fenced to exclude <u>domestic</u> cattle, horses, deer and pigs, unless those animals are prevented from entering the bed of the water by a stock proof natural barrier formed by topography or vegetation"</p> <p>AND AMEND Clause 2 to read "New fences installed after 22 October 2016 must be located to ensure cattle, horses, deer and pigs cannot be within one metre of the bed of the water body (excluding constructed wetlands <u>and livestock crossing structures</u>)"</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND Clause 5(i & ii) to provide for a minimum stream width after consultation with landowners.
Schedule 1 - Requirements for Farm Environment Plans	PC1-5482	Oppose the provision	AMEND Schedule 1 to provide for a separate section for livestock farming following consultation with landowners.
5.1.5 Conditions for Permitted Activity Rule 5.1.4.11 and Standards and Terms for Controlled Activity Rules	PC1-5483	Oppose the provision	AMEND Section 5.1.5 to be consistent with the new forest harvesting standards agreed by the forestry industry and government, once they are finalised, and suspend this provision for reconsiderations when the agreed standards are released.

## Simpson, Greg John

Submitter ID: 73225

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-5524	Oppose the provision	AMEND Objective 1 to be backed by a well-defined model that shows how the land and water will look in 90 years. Nitrogen Reference Point: AND AMEND to provide for the opportunity to use an effects based system to deal with the issues within each farm.
Objective 3: 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	PC1-5525	Oppose the provision	AMEND Objective 3 to be backed by a well-defined model that shows how the land and water will look in 90 years.
Objective 4: People and community resilience	PC1-5540	Oppose the provision	AMEND Objective 4 to provide for the opportunity to use an effects based system to deal with the issues within each farm.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-5541	Oppose the provision	AMEND Policy 2 to provide for the opportunity to use an effects based system to deal with the issues within each farm. AND AMEND to provide for higher allowances for land inputs at the start, especially in the case of low producing farms.
Policy 5: Staged approach	PC1-5526	Oppose the provision	AMEND Policy 5 to be backed by a well-defined model that shows how the land and water will look in 90 years.
Policy 6: Restricting land use change	PC1-5553	Oppose the provision	AMEND Policy 6 to allow for land use change and for landowners to increase production and profitability per hectare AND AMEND to provide for irrigation for growth, improved crops and higher pasture yields.
Policy 7: Preparing for allocation in the future	PC1-5527	Oppose the provision	AMEND Policy 7 to be backed by a well-defined model that shows how the land and water will look in 90 years.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			Nitrogen Reference Point: AND AMEND to provide for the opportunity to use an effects based system to deal with the issues within each farm.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-5551	Oppose the provision	No specific decision was requested for Policy 16.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-5532	Oppose the provision	AMEND Rule 3.11.5.1 to provide for stock exclusion through Farm Environment Plans AND AMEND to provide for cattle exclusion from large water bodies, streams and lakes and not small waterways and steep or impractical country AND AMEND to provide for water reticulation to be subsidised.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-5533	Oppose the provision	AMEND Rule 3.11.5.2 to provide for stock exclusion through Farm Environment Plans AND AMEND to provide for cattle exclusion from large water bodies, streams and lakes and not small waterways and steep or impractical country AND AMEND to provide for water reticulation to be subsidised.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-5528	Oppose the provision	AMEND Rule 3.11.5.3 to be backed by a well-defined model that shows how the land and water will look in 90 years AND AMEND to provide for stock exclusion through Farm Environment Plans AND AMEND to provide for cattle exclusion from large water bodies, streams and lakes and not small waterways and steep or impractical country, AND AMEND to provide for water reticulation to be subsidised. Farm Environment Plans: AND AMEND to provide for higher allowances for land inputs at the start, especially in the case of low producing farms. Nitrogen Reference Point: AND AMEND to provide for the opportunity to use an effects based system to deal with the issues within each farm.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-5529	Oppose the provision	AMEND Rule 3.11.5.4 to be backed by a well-defined model that shows how the land and water will look in 90 years. AND AMEND to provide for stock exclusion through Farm Environment Plans, AND AMEND to provide for cattle exclusion from large water bodies, streams and lakes and not small waterways and steep or impractical country, AND AMEND to provide for water reticulation to be subsidised. Nitrogen Reference Point: AND AMEND to provide for the opportunity to use an effects based system to deal with the issues within each farm.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-5530	Oppose the provision	AMEND Rule 3.11.5.5 to be backed by a well-defined model that shows how the land and water will look in 90 years. Nitrogen Reference Point: AND AMEND to provide for the opportunity to use an effects based system to deal with the issues within each farm.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-5546	Oppose the provision	AMEND Rule 3.11.5.6 to provide for the opportunity to use an effects based system to deal with the issues within each farm.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-5549	Oppose the provision	AMEND Rule 3.11.5.7 to allow for land use change and for landowners to increase production and profitability per hectare

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to provide for irrigation for growth, improved crops and higher pasture yields Rule 3.11.5.7: AND AMEND Schedule B to provide for the opportunity to use an effects based system to deal with the issues within each farm Rule 3.11.5.7: AND AMEND Schedule 1 to provide for higher allowances for land inputs at the start, especially in the case of low producing farms.
Schedule B - Nitrogen Reference Point	PC1-5536	Oppose the provision	AMEND Schedule B to provide for the opportunity to use an effects based system to deal with the issues within each farm.
Schedule C - Stock exclusion	PC1-5531	Oppose the provision	AMEND Schedule C to provide for stock exclusion through Farm Environment Plans AND AMEND to provide for cattle exclusion from large water bodies, streams and lakes and not small waterways and steep or impractical country AND AMEND to provide for water reticulation to be subsidised.
Schedule 1 - Requirements for Farm Environment Plans	PC1-5550	Oppose the provision	AMEND Schedule 1 to provide for the opportunity to use an effects based system to deal with the issues within each farm. AND AMEND to provide for higher allowances for land inputs at the start, especially in the case of low producing farms.

## Simpson, Jennifer

Submitter ID: 74145

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-9874	Oppose the provision	AMEND Objective 1 so it is modelled and will clearly set out what the land will be in 80 years' time. AND DELETE the use of a Nitrogen Reference Point from PPC1. AND AMEND PPC1 so that the effects of Nitrogen are addressed on a property basis.
Objective 3: 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	PC1-9875	Oppose the provision	AMEND Objective 3 so it is modelled and will clearly set out what the land will be in 80 years' time.
Objective 4: People and community resilience	PC1-9881	Oppose the provision	DELETE the use of a Nitrogen Reference Point from PPC1. AND AMEND PPC1 so that the effects of Nitrogen are addressed on a property basis.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-9882	Oppose the provision with amendments	DELETE the use of a Nitrogen Reference Point from PPC1 AND AMEND PPC1 so that the effects of Nitrogen are addressed on a property basis.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12916	Oppose the provision with amendments	AMEND the Farm Environment Plan provisions of PPC1 so that farmers can do a lot of the work themselves.
Policy 5: Staged approach	PC1-9876	Oppose the provision	AMEND Policy 5 so it is modelled and will clearly set out what the land will be in 80 years' time
Policy 6: Restricting land use change	PC1-9894	Oppose the provision	AMEND Policy 6 to allow more flexibility around changing land use.
Policy 7: Preparing for allocation in the future	PC1-9877	Oppose the provision with amendments	AMEND Policy 7 so it is modelled and will clearly set out what the land will be in 80 years' time. AND DELETE the use of a Nitrogen Reference Point from PPC1. AND AMEND PPC1 so that the effects of Nitrogen are addressed on a property basis.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-9888	Oppose the provision with amendments	AMEND the stock exclusion provisions of Rule 3.11.5.1, so fencing is used when practical and a blanket rule is not imposed on all waterways. AND AMEND the stock exclusion provisions of Rule 3.11.5.1, so stock exclusion follows national guidelines.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-9891	Oppose the provision with amendments	AMEND the stock exclusion provisions of Rule 3.11.5.2, so fencing is used when practical and a blanket rule is not imposed on all waterways. AND AMEND the stock exclusion provisions of Rule 3.11.5.2, so stock exclusion follows national guidelines.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-9878	Oppose the provision with amendments	AMEND Rule 3.11.5.3 so it is modelled and will clearly set out what the land will be in 80 years' time AND DELETE the use of a Nitrogen Reference Point from PPC1 AND AMEND PPC1 so that the effects of Nitrogen are addressed on a property basis AND AMEND the Farm Environment Plan provisions of PPC1, so that farmers can do a lot of the work themselves.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-9879	Oppose the provision with amendments	Rule 3.11.5.4 is opposed as there is no certainty about what will happen in 10 years' time, so how can plans be put in place now AND AMEND PPC1 so that the effects of Nitrogen are addressed on a property basis AND AMEND the Farm Environment Plan provisions of PPC1, so that farmers can do a lot of the work themselves.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-9880	Oppose the provision with amendments	AMEND Rule 3.11.5.5 so it is modelled and will clearly set out what the land will be in 80 years' time AND DELETE the use of a Nitrogen Reference Point from PPC1 AND AMEND PPC1 so that the effects of Nitrogen are addressed on a property basis AND AMEND the Farm Environment Plan provisions of PPC1 so that farmers can do a lot of the work themselves.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-9883	Oppose the provision with amendments	DELETE the use of a Nitrogen Reference Point from PPC1 AND AMEND PPC1 so that the effects of Nitrogen are addressed on a property basis.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13098	Oppose the provision with amendments	AMEND the Farm Environment Plan provisions of PPC1 so that farmers can do a lot of the work themselves.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-9884	Oppose the provision with amendments	DELETE the use of a Nitrogen Reference Point from PPC1 AND AMEND PPC1 so that the effects of Nitrogen are addressed on a property basis

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND the Farm Environment Plan provisions of PPC1, so that farmers can do a lot of the work themselves AND AMEND Rule 3.11.5.7 to allow more flexibility around changing land use.
Schedule B - Nitrogen Reference Point	PC1-9887	Oppose the provision	DELETE the use of a Nitrogen Reference Point from PPC1. AND AMEND PPC1 so that the effects of Nitrogen are addressed on a property basis.
Schedule C - Stock exclusion	PC1-9893	Oppose the provision with amendments	AMEND Schedule C to ENSURE fencing is used when practical and a blanket rule is not imposed on all waterways. AND AMEND Schedule C to ENSURE stock exclusion follows national guidelines.
Schedule 1 - Requirements for Farm Environment Plans	PC1-9886	Oppose the provision with amendments	DELETE the use of a Nitrogen Reference Point from PPC1 AND AMEND PPC1 so that the effects of Nitrogen are addressed on a property basis.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12519	Oppose the provision with amendments	AMEND the Farm Environment Plan provisions of PPC1, so that farmers can do a lot of the work themselves.

## Simpson, Trevor Andrew

Submitter ID: 67472

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-10923	Oppose the provision	Ensure the implementation of the Vision and Strategy is the responsibility of the Waikato River Authority and that the Waikato River Authority work with the agricultural sectors to devise a plan that fits the Vision and Strategy AND AMEND to demonstrate various future options, such as the effect of different time frames (e.g. 80 to 150 years), the effect of continuing with the status quo and current trends of improvements in water quality, and the effects of different interpretations of swimmability AND AMEND to quantify the effects of pest fish, hydro dams and lakes on water quality and include those in mitigation calculations in PPC1.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-10924	Oppose the provision	AMEND Table 3.11-1 to use a medium percentile figure for E.coli and Nitrate targets AND AMEND to use the Waikato River Authority's interpretation of swimmability.

## Sinclair, Andrew and Louise

Submitter ID: 74047

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4749	Support the provision	RETAIN stock exclusion, nutrient budgeting, environment plans, and restricting land use change.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-4739	Support the provision	RETAIN Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-4743	Support the provision	RETAIN Policy 2.
Policy 6: Restricting land use change	PC1-4747	Support the provision	RETAIN Policy 6.
3.11.4.2 Certified Industry Scheme	PC1-4744	Support the provision	RETAIN Method 3.11.4.2.
3.11.4.3 Farm Environment Plans	PC1-4745	Support the provision	RETAIN Method 3.11.4.3.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-4740	Support the provision	RETAIN Rule 3.11.5.2(2) AND RETAIN Method 3.11.5.2 (4) and (5).
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-4748	Support the provision	RETAIN Rule 3.11.5.7.
Schedule C - Stock exclusion	PC1-4741	Support the provision	RETAIN Schedule C.

## Sinclair Family Trust

Submitter ID: 72029

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Full achievement of the Vision and Strategy will be intergenerational	PC1-6776	Support the provision	RETAIN the staged approach where PPC1 aims at achieving 10 per cent of the Vision and Strategy within the next 10 years.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-6781	Support the provision	RETAIN Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12917	Support the provision with amendments	AMEND to ADD the following to Policy 2(c): " <u>Provide guidelines within the Farm Environment Plan to ensure that:</u> <u>i. Farms with Nitrogen losses lower than the 75th percentile plan and implement good practice;</u> <u>ii. Farms above the 75th percentile for Nitrogen losses plan and implement methods to reduce to below that value"</u>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12918	Support the provision with amendments	DELETE Policy 2(d) and change to the suggestion made by DairyNZ for Policy 2(d): ["...d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the <del>amount</del> risk of current discharge <u>leaving a property from overland flow or leaching below the root zone, as identified in farm environment plans entering waterbodies</u> (those discharging more are expected to make greater reductions), and

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			proportionate to the scale of water quality improvement required in the sub-catchment <u>plan</u> ; and..." ]
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12919	Support the provision with amendments	RETAIN Policy 2(e).
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-6787	Support the provision with amendments	AMEND Policy 2(a) to include a requirement to establish the current situation (management, infrastructure, actions) in the Farm Environment Plan AND RETAIN Policy 2(b).
Policy 6: Restricting land use change	PC1-6800	Support the provision	RETAIN Policy 6.
3.11.4.2 Certified Industry Scheme	PC1-6808	Support the provision	RETAIN Method 3.11.4.2.
Schedule B - Nitrogen Reference Point	PC1-6823	Support the provision with amendments	AMEND Schedule B to read: "f. The reference period is the <del>two</del> <u>three</u> financial years covering <u>2013/14</u> , 2014/15 and 2015/16, except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016."
Schedule C - Stock exclusion	PC1-6832	Support the provision with amendments	RETAIN Schedule C AND AMEND to clarify where to measure one metre back from the water body.
Schedule 1 - Requirements for Farm Environment Plans	PC1-6810	Support the provision with amendments	AMEND clause (5) of Schedule 1 to read: "5. A description of the following: (a) Actions, timeframes and other measures to <del>ensure that</del> <u>manage</u> the diffuse discharge of nitrogen from the property or enterprise, as measured by the five-year <del>rolling</del> average annual nitrogen loss as determined by the use of the current version of OVERSEER, <del>does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified; or</del> <u>constitute good management practice.</u> .... <u>(c) Where the Nitrogen Reference Point falls between the 50th and 74th percentile, identify and implement actions required to work towards industry good management practice in order to reduce their nitrogen leaching to at least 10 per cent below their reference point by 1 July 2026.</u> <u>(d) Where the Nitrogen Reference Point falls between the 25th and 49th percentile, continue with use of good management practice to hold at or below the Nitrogen Reference Point over a 5-year average.</u> <u>(e) Where the Nitrogen Reference point falls under the 25th percentile continue with use of good management practice with the flexibility of 10 per cent variation from the reference point over a 5-year average."</u>

## Singleton, Tim

Submitter ID: 74161



Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4594	Oppose the provision with amendments	MAKE any consequential amendments including to the objectives, policies and rules or restructuring to give effect to the relief sought.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-4595	Oppose the provision	DELETE Rule 3.11.5.1 the provision of excluding domestic cattle from all water bodies for all hill country sheep and beef farms. AND AMEND to ensure cattle cannot break feed on land with a main waterway unless it is fenced. AND AMEND to allow planning through Farm Environment Plans to identify which paddocks could be wintered on to minimise run off. AND DELETE fencing requirements for farms that are not intensively farmed [<8SU/ha]. AND AMEND to allow stock crossings at certain points of the river.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-4596	Oppose the provision	DELETE the provision of excluding domestic cattle from all water bodies for all hill country sheep and beef farms. Rule 3.11.5.2 AND AMEND to ensure cattle cannot break feed on land with a main waterway unless it is fenced. AND AMEND to allow planning through Farm Environment Plans to identify which paddocks could be wintered on to minimise run off. AND DELETE fencing requirements for farms that are not intensively farmed [<8SU/ha]. AND AMEND to allow stock crossings at certain points of the river.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-4597	Oppose the provision	DELETE in Rule 3.11.5.3 the provision of excluding domestic cattle from all water bodies for all hill country sheep and beef farms. AND AMEND to ensure cattle cannot break feed on land with a main waterway unless it is fenced. AND AMEND to allow planning through Farm Environment Plans to identify which paddocks could be wintered on to minimise run off. AND DELETE fencing requirements for farms that are not intensively farmed [<8SU/ha]. AND AMEND to allow stock crossings at certain points of the river.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-4598	Oppose the provision	DELETE from Rule 3.11.5.4 the provision of excluding domestic cattle from all water bodies for all hill country sheep and beef farms. AND AMEND to ensure cattle cannot break feed on land with a main waterway unless it is fenced. AND AMEND to allow planning through Farm Environment Plans to identify which paddocks could be wintered on to minimise run off. AND DELETE fencing requirements for farms that are not intensively farmed [<8SU/ha]. AND AMEND to allow stock crossings at certain points of the river.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-4600	Oppose the provision	DELETE in Rule 3.11.5.7 the provision of excluding domestic cattle from all water bodies for all hill country sheep and beef farms. AND AMEND to ensure cattle cannot break feed on land with a main waterway unless it is fenced. AND AMEND to allow planning through Farm Environment Plans to identify which paddocks could be wintered on to minimise run off. AND DELETE fencing requirements for farms that are not intensively farmed [<8SU/ha]. AND AMEND to allow stock crossings at certain points of the river.
Schedule B - Nitrogen Reference Point	PC1-4601	Oppose the provision	AMEND Schedule B to ensure low users of nitrogen do not have this privilege/tool completely taken away.
Schedule C - Stock exclusion	PC1-4593	Oppose the provision	DELETE from Schedule C the provision of excluding domestic cattle from all water bodies for all hill country sheep and beef farms.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND schedule C to ensure cattle cannot break feed on land with a main waterway unless it is fenced.</p> <p>AND AMEND Schedule C to allow planning through Farm Environment Plans to identify which paddocks could be wintered on to minimise run off.</p> <p>AND DELETE from Schedule C fencing requirements for farms that are not intensively farmed [<math>&lt;8\text{SU/ha}</math>].</p> <p>AND AMEND Schedule C to allow stock crossings at certain points of the river.</p>

## Slack, Hayden Robert

Submitter ID: 73942

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-3592	Oppose the provision	No specific relief sought for Rule 3.11.5.2.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-3324	Support the provision with amendments	DELETE the Nitrogen Reference Point. (Rule 3.11.5.3).
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-3328	Oppose the provision	No specific relief sought for Rule 3.11.5.7.
Schedule B - Nitrogen Reference Point	PC1-3325	Oppose the provision	DELETE from Schedule B g (i-vi).
Schedule 1 - Requirements for Farm Environment Plans	PC1-3329	Support the provision	No specific relief sought for Schedule 1 - Farm Environment Plans.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12520	Oppose the provision	No specific relief sought for Schedule 1 - Stock Exclusion.

## Slack, Robert John

Submitter ID: 71294

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7590	Not stated	No specific decision requested for PPC1.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm	PC1-7586	Oppose the provision	AMEND PPC1 so that, rather being based on individual plans, management is on a sub-catchment basis.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Environment Plan under a Certified Industry Scheme			
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-7583	Oppose the provision	AMEND PPC1 so that it has sub-catchment plans with farmers working together under Best Practicable Options. AND AMEND PPC1 so that feed pads are installed under herd homes to capture nitrogen and to control its distribution.

## Smith, Allan John

Submitter ID: 72020

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-3033	Oppose the provision	AMEND PPC1 to ADOPT a sub-catchment approach to addressing contaminants that are relevant to each farm, not a blanket restriction of one nutrient that may not be relevant in a waterways in that sub-catchment. e.g. hill country. Develop a plan that spreads the costs across the region, particularly for the sub-catchment plans which should be focused on the areas where the benefits are greatest.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-3026	Support the provision with amendments	AMEND Objective 1 so that the targets do not apply during flood events AND ENSURE targets are achievable.
3.11.4.5 Sub-catchment scale planning	PC1-3034	Support the provision with amendments	AMEND Method 3.11.4.5 to prioritise development of sub-catchment plans.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-3028	Oppose the provision	AMEND Rule 3.11.5.1 to apply national stock exclusion requirements on flat and rolling land but not hill country. AND AMEND to enable flexibility in land use, discharges and stocking rates up to these standards.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-3030	Oppose the provision	AMEND Rule 3.11.5.2 to apply national stock exclusion requirements on flat and rolling land but not hill country. AND AMEND to enable flexibility in land use, discharges and stocking rates up to these standards.
Schedule C - Stock exclusion	PC1-3037	Oppose the provision	DELETE Schedule C and REPLACE with the proposed national stock exclusion regulations (Ministry of Environment 2/17) AND AMEND so that cattle can cross a waterbody without requiring a formed crossing structure, when crossings are less than 3 times per week.

## Smith, Angus Hardwick

Submitter ID: 74042

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-9909	Oppose the provision	DELETE PPC1 and rewrite PPC1 in its complete form. AND RE-NOTIFY after having been re-written. AND AMEND to have more realistic sediment reduction goals. AND AMEND to develop systems to eliminate koi carp from all waterways and manage gorse. AND AMEND to enable farmers to continue to decide for themselves the best farming system for their property.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-9908	Oppose the provision	AMEND Rule 3.11.5.7. to enable farmers to continue to decide for themselves the best farming system for their property.

## Smith, Barrie Allan and Gwyneth Monica

Submitter ID: 71420

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-1210	Support the provision with amendments	RETAIN the long term restoration and protection of water quality for the Waikato and Waipā Rivers. Objective 1 AND AMEND PPC1 to be holistic and include all sources influencing the health and well-being of the Waikato River and its catchments, for example koi carp, point source discharges and hydro-dams. AND AMEND to address contaminants on a sub-catchment basis, to enable targeting of the highest discharging [omitting] sub-catchments. AND MAKE any other consequential changes necessary to give effect to decisions requested in this submission.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-1211	Support the provision with amendments	Objective 2 RETAIN the maintenance of long term social, economic and cultural well-being of the Waikato and Waipā catchment communities AND AMEND the rules in PPC1 to remove the Nitrogen Reference Point in order to align with the intention of Objective 2 AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored Farm Environment Plan in order to align with the intention of Objective 2 AND AMEND to address contaminants on a sub-catchment basis, to enable targeting of the highest discharging sub-catchments in order to align with the intention of Objective 2 AND develop robust indicators to measure social, economic and cultural well-being.
Objective 3: Short-term improvements in water quality in the first stage of restoration and	PC1-1217	Support the provision with amendments	RETAIN a 10% achievement of the long-term water quality targets set out in PPC1 by 2026. AND AMEND the rules in PPC1 to remove Nitrogen Reference Points. AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
protection of water quality for each sub-catchment and Freshwater Management Unit			AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.
Objective 4: People and community resilience	PC1-1221	Support the provision with amendments	RETAIN the staged approach to change. Objective 4 AND AMEND rules in PPC1 to remove the Nitrogen Reference Point and land use change restriction. AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-1225	Support the provision with amendments	RETAIN in Policy 1 managing diffuse discharges and water quality on a sub-catchment basis.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12653	Support the provision with amendments	AMEND Policy 1 to read as follows: "c. 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> d. 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 <u>target critical source areas</u> " AND AMEND to clarify how slope is measured, given the ranges of topography experiences within each paddock and adjoining watercourses.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12654	Support the provision with amendments	AMEND Policy 1 to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12655	Support the provision with amendments	AMEND the rules in PPC1 to reflect Policies 1 and 9.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-1227	Support the provision with amendments	RETAIN appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12920	Support the provision with amendments	AMEND PPC1 to reflect Policy 1 in adopting a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12921	Oppose the provision	AMEND PPC1 to remove Nitrogen Reference Points.
Policy 5: Staged approach	PC1-1231	Support the provision with amendments	RETAIN the staged approach to change. AND AMEND the rules in PPC1 to remove the Nitrogen Reference Point. AND AMEND to adopt a sub-catchment approach to ensure collaborative and fair management of resources within each sub-catchment.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.
Policy 6: Restricting land use change	PC1-1254	Oppose the provision with amendments	AMEND Policy 6 to change the activity status of land use change from non-complying activity to a permitted activity. AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored Farm Environment Plan.
Policy 8: Prioritised implementation	PC1-1255	Support the provision	RETAIN Policy 8.
Policy 14: Lakes Freshwater Management Units	PC1-1256	Support the provision	RETAIN Policy 14.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-1257	Support the provision with amendments	RETAIN Farm Environment Plans, Certified Industry Schemes and stock exclusion where practical AND AMEND Rule 3.11.5.3 to remove Nitrogen Reference Points AND AMEND Rule 3.11.5.3 to read: 3. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs AND AMEND to address contaminants on a sub-catchment basis, to enable targeting of the highest emitting [omitting] sub-catchments AND CLARIFY how long a Farm Environment Plan will be viable for AND CLARIFY stock exclusion requirements i.e setback buffers and where to measure setback on undulating land.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-1260	Oppose the provision	AMEND Rule 3.11.5.7 to address contaminants on a sub-catchment basis, to enable targeting of the highest discharging sub-catchments. AND AMEND the land use change Rule activity status from non-complying activity to a permitted activity. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored Farm Environment Plan. AND CLARIFY how resource consent would work for leased land.

## Smith, Graham Wallace and Diana Susan

Submitter ID: 73937

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-2974	Oppose the provision with amendments	AMEND Rule 3.11.5.7 by allowing flexibility for movement in stock types in the drystock industry with stocking rates (rather than nitrogen caps) being the determining factor so that there is no need for permission to respond to the various crisis and market forces.

## Smith, Noel

Submitter ID: 72106

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8395	Oppose the provision	No specific decision sought for PPC1.
3.11.5 Rules	PC1-8393	Oppose the provision	AMEND PPC1 to remove the need for a resource consent where there is no approved beef and lamb sector certified industry scheme and allow for another process other than a resource consent.

## Smuts-Kennedy, Chris

Submitter ID: 73712

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7359	Oppose the provision	AMEND PPC1 timeframe from 80 to 40 years, with each time-bound step to be achieved in half the proposed time. AND AMEND PPC1 to manage run-off through riparian strip planting and creation of wetland traps. AND AMEND PPC1 so it addresses the intensity and type of land use. AND AMEND to ensure outcome monitoring of water quality, as a result of PPC1, meets SMART objectives.
Schedule B - Nitrogen Reference Point	PC1-7363	Oppose the provision	CONSIDER a review of the use of the OVERSEER Model in PPC1 AND CONSIDER alternative techniques such as direct limits on the intensity and nature of use and nutrient input in relation to soil type, topography and weather/climate for each farm.

## Smuts-Kennedy, Robin

Submitter ID: 73323

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6304	Oppose the provision	AMEND PPC1 to ensure intensity and type of land use are addressed as primary issues in the plan. AND AMEND PPC1 to ensure that outcome monitoring in the waterways ensures that SMART objectives are met.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-6308	Oppose the provision with amendments	AMEND Objective 1 to achieve the plan within 40 years.
Objective 3: Short-term improvements in water quality in the	PC1-6310	Oppose the provision with amendments	AMEND Objective 3 to achieve each time bound step in the plan in half the time.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit			
Policy 5: Staged approach	PC1-6313	Oppose the provision with amendments	AMEND Policy 5 to read: "Recognize that....will need to be staged over <del>80</del> 40 years,..."
Schedule B - Nitrogen Reference Point	PC1-6306	Oppose the provision with amendments	AMEND Schedule B to review the use of OVERSEER and consider alternative techniques.

## Smyth, Mark Stewart Jonas

Submitter ID: 71410

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-1183	Support the provision with amendments	RETAIN Objective 1.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-1185	Support the provision with amendments	RETAIN Objective 2 subject to amendments that remove reference to the Nitrogen Reference Point, to reduce the stock exclusion slope measure and to the definition of a waterway.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-1196	Oppose the provision	DELETE from Policy 1 reference to the Nitrogen Reference Point. AND REPLACE with Farm Environment Plans.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-1200	Oppose the provision	DELETE from Policy 2 reference to the Nitrogen Reference Point. AND REPLACE with Farm Environment Plans.
Policy 6: Restricting land use change	PC1-1189	Oppose the provision	DELETE Policy 6.
3.11.4.3 Farm Environment Plans	PC1-1203	Support the provision with amendments	AMEND Method 3.11.4.3 and Schedule 1 to extend the time frame for preparing and completing Farm Environment Plans.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-1191	Support the provision with amendments	AMEND Rule 3.11.5.1 to remove the references to Schedule C and Schedule 1. AND REPLACE with Farm Plans that are practical and flexible. AND AMEND to align with the national policy on water.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-1193	Support the provision with amendments	AMEND Rule 3.11.5.2 to remove the references to Schedule C and Schedule 1. AND REPLACE with Farm Plans that are practical and flexible. AND AMEND to align with the national policy on water.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-1194	Support the provision with amendments	AMEND Rule 3.11.5.3 to remove the references to Schedule C and Schedule 1. AND REPLACE with Farm Plans that are practical and flexible. AND AMEND to align with the national policy on water.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-1195	Support the provision with amendments	AMEND Rule 3.11.5.4 to remove the references to Schedule C and Schedule 1. AND REPLACE with Farm Plans that are practical and flexible. AND AMEND to align with the national policy on water.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-1190	Oppose the provision	DELETE Rule 3.11.5.7.
Schedule B - Nitrogen Reference Point	PC1-1201	Oppose the provision	DELETE Schedule B.
Schedule C - Stock exclusion	PC1-1429	Support the provision with amendments	AMEND Schedule C definition of a waterway to be greater than 1 metre and deeper than 30cm.
Schedule 1 - Requirements for Farm Environment Plans	PC1-1202	Support the provision with amendments	AMEND Schedule 1 to extend the time frame for preparing and completing Farm Environment Plans.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12521	Support the provision with amendments	Schedule 1 - AMEND the stock exclusion requirements from 25 degrees to 15 degrees.

## Somerville, Diarmid

Submitter ID: 73719

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4875	Oppose the provision	No specific decision sought for PPC1.

## Southern Fresh Foods Ltd

Submitter ID: 71408

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-1207	Oppose the provision	AMEND Rule 3.11.5.5 to remove a Nitrogen Reference Point per entity from the plan AND REPLACE with a Nitrogen Reference Point per crop that reduces 10% over 10 years to a level that is an industry accepted standard for each specific crop AND provide for the establishment of an alternative methods or model, which has the capacity to deal with the complexity levels needed

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND Rule 3.11.5.5 to provide operations that demonstrate clear decreases in diffuse discharges to go from a non-complying activity to a restricted discretionary activity.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-1208	Oppose the provision	AMEND Rule 3.11.5.7 to provide for new land usage for commercial vegetable production as a restricted discretionary activity if it can be demonstrated the there will be no increases in discharges. AND DELETE the reference to a non-complying activity and the requirement of a resource consent.
Schedule B - Nitrogen Reference Point	PC1-1209	Oppose the provision	AMEND Schedule B to remove a Nitrogen Reference Point per entity from the plan AND REPLACE with a Nitrogen Reference Point per crop that reduces 10% over 10 years to a level that is an industry accepted standard for each specific crop AND AMEND to provide for the establishment of an alternative methods or model, which has the capacity to deal with the complexity levels needed.

## Southern Pastures Limited Partnership

Submitter ID: 74062

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-11301	Support the provision with amendments	AMEND PPC1 to clarify the type of resource consent which must be applied for in respect of its proposed new rules.
Background and explanation	PC1-11071	Oppose the provision with amendments	AMEND the 'Background and explanation' to explain how the key objective of PPC1 can be achieved when part of the Waikato River has been removed from the area which is subject to PPC1. AND AMEND the 'Background and explanation' section to explain how the staged approach to achieving the objective identified above can be implemented and the National Policy Statement for Freshwater Management given effect to, in light of the withdrawal of a significant geographic area of the Waikato River catchment.
Intrinsic values - History	PC1-11075	Support the provision	No specific decision sought for 3.11.1.1 Mana Atua - Intrinsic values - History.
Intrinsic values - Ecosystem health	PC1-11251	Support the provision	No specific decision requested 3.11.1.1 Mana Atua - Intrinsic values - Ecosystem health.
Intrinsic values - Natural form and character	PC1-11252	Support the provision	No specific decision requested for 3.11.1.1 Mana Atua - Intrinsic values - Natural form and character.
Use values - Wai tapu	PC1-11077	Support the provision	No specific decision sought 3.11.1.2 Mana Tangata - Use values - Wai tapu.
Use values - Geothermal	PC1-11081	Support the provision	No specific decision sought 3.11.1.2 Mana Tangata - Use values - Geothermal.
Use values - Mahinga kai	PC1-11082	Support the provision	No specific decision sought for 3.11.1.2 Mana Tangata - Use values - Mahinga kai.
Use values - Human health for recreation	PC1-11083	Support the provision	No specific decision sought for 3.11.1.2 Mana Tangata - Use values.
Use values - Transport and tauranga waka	PC1-11084	Support the provision	No specific decision sought for 3.11.1.2 Mana Tangata - Use values - Transport and tauranga waka.
Use values - Primary production	PC1-11085	Support the provision	No specific decision sought for 3.11.1.2 Mana Tangata - Use values - Primary production.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Water supply	PC1-11086	Support the provision	AMEND the Use Value for Water Supply to include reference to water supply for commercial, industrial and primary production purposes.
Use values - Commercial, municipal and industrial use	PC1-11087	Support the provision with amendments	<p>AMEND as follows (or alternative wording which addresses the submission):  <u>"The rivers are working rivers and supply water, generate electricity and support primary production, as well as providing drainage. The rivers also provide opportunities for activities which generate positive economic outcomes. Fresh water is used for industrial and municipal processes, which rely on the assimilative capacity for discharges to surface water bodies. In addition:</u></p> <ul style="list-style-type: none"> <li>• The primary production industries which rely on the rivers generate demand for products and services which, in turn facilitates economic growth. This enables individual businesses and communities to provide for their economic well-being and contributes to the vibrancy of small towns. financial and economic contribution individual business and the community and the vibrancy of small towns.<del>They are working rivers; they create wealth.</del></li> <li>• Those industries are <del>important</del> <u>critical</u> to the monetary economy of the Waikato Region, <del>enabling a positive brand to promote to overseas markets.</del></li> <li>• The rivers provide for domestic and international tourism. Promotion of a clean, green image attracts international and domestic visitors.</li> <li>• The rivers provide <u>drainage and</u> assimilative capacity for the wastewater disposal, flood and storm water, and ecosystem services through community schemes or on site disposal."</li> </ul>
Use values - Mitigating flood hazards	PC1-11088	Support the provision with amendments	AMEND Use Value - Mitigating Flood Hazards to include reference to livestock in value.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-11089	Support the provision with amendments	Refer to amendments sought to policies and rules regarding land use flexibility, including land use change and offset mitigation opportunities.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-11093	Support the provision with amendments	AMEND Objective 2 to read as follows (or similar to address reason for submission point): <u>"Waikato and Waipā communities are able to provide for their social, economic and cultural well-being in the short term (10 years) and long term (80 years), recognising that the Waikato and Waipā communities and their economy <u>may ultimately</u> benefit from the restoration and protection of water quality in the Waikato River catchment. This in turn will <del>which</del> enables the people and communities to continue to provide for their social, economic and cultural well-being."</u>
Objective 3: 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	PC1-11095	Oppose the provision with amendments	AMEND Objective 3 as set out below, or such alternative wording in order to address the reasons for submission: <u>"Actions put in place and Changes to land use and water management are implemented by 2026 <del>which</del> reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, <del>and</del> are sufficient to <del>eventually</del> 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 changes towards</u>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			the long term water quality improvements is indicated by the short term water quality attribute^ targets^ in Table 3.11-1."
Objective 4: People and community resilience	PC1-11096	Oppose the provision with amendments	AMEND Objective 4 to read: "A staged approach to <del>changing enables people and communities to provide for their</del> <u>the management of land use and related diffuse discharges</u> <del>undertake adaptive</del> enables people and communities to <u>continue</u> to 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. <del>Considering the values and uses when</del> taking actions to achieve the attribute^ targets^ for the Waikato and Waipā Rivers in Table 3.11-1; and b. Recognising that further contaminant reductions will be required by subsequent regional plans <del>and signalling anticipated future management approaches that will be needed in order</del> to meet Objective 1."
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-11097	Support the provision	No specific decision sought for Objective 5.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-11098	Oppose the provision with amendments	AMEND PPC1 to define or explain what is meant by 'low level of contaminant discharge' and 'high levels of contaminant discharge'.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-11099	Oppose the provision with amendments	AMEND Clause d) of 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 to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchments <u>which is capable of being achieved in the short-term taking into account the particular characteristics of each sub-catchment;...</u> " ADD a NEW clause that reads: " <u>da. Providing for and allowing opportunity for offset mitigation between properties or enterprises which will achieve the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens proportionate to the amount of current discharge and proportionate to the scale of water quality improvement required in the sub-catchments capable of being achieved in the period to 2026, taking into account the particular characteristics of each sub-catchment.</u> "
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-11100	Support the provision with amendments	AMEND PPC1 to provide a definition or explanation of 'low discharges'. AND the submitter reserves its position, subject to acceptance of its relief sought elsewhere in its submission.
Policy 5: Staged approach	PC1-11101	Support the provision with amendments	The submitter reserves its position, subject to acceptance of its relief sought elsewhere in its submission.
Policy 6: Restricting land use change	PC1-11102	Oppose the provision with amendments	AMEND Policy 6 to read: "Except as provided for in Policy 16, <u>Policy [X1]</u> , land use change consent applications..." AND ADD a NEW policy that reads: " <u>Policy [X1] - Flexibility for land use change</u>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p><u>Land use change consent applications for activities that will not result in an increased diffuse discharge or nitrogen, phosphorus, sediment and microbial pathogens across a property or enterprise will generally be granted, taking into account:</u></p> <p><u>i. Commitment to the 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;</u></p> <p><u>ii. The creation of positive economic, social and cultural benefits for the Waikato Region."</u></p>
Policy 7: Preparing for allocation in the future	PC1-11103	Oppose the provision with amendments	<p>AMEND Policy 7 to read:</p> <p><del>"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 for the purposes of developing future regional plan changes to support this, including 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 allocation should consider that following principles:</del></p> <p><del>a. Land suitability (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 purposes of allocation); and</del></p> <p><del>b. Allowance for flexibility of development of tangata whenua ancestral land; and</del></p> <p><del>c. Minimise social disruption and costs in the transition to the 'land suitability' approach; and</del></p> <p><del>d. Future allocation decisions should take advantage of new data and knowledge"</del></p>
Policy 8: Prioritised implementation	PC1-11104	Support the provision with amendments	<p>AMEND Policy 8 to read:</p> <p><u>"In addition to implementing Policies 2, 3 and 9," prioritise the management of land and water resources "in the short term to 2026" "by implementing Policies 2, 3 and 9, and" in accordance with the prioritisation of areas set out in Table 3.11-2...</u></p>
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-11106	Support the provision	No specific decision sought for Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-11107	Support the provision	No specific decision sought for Policy 10.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-11108	Support the provision	No specific decision sought Policy 11.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-11109	Support the provision	No specific decision sought for Policy 12.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 13: Point sources consent duration	PC1-11110	Support the provision	No specific decision sought for Policy 13.
Policy 14: Lakes Freshwater Management Units	PC1-11111	Support the provision	No specific decision sought for Policy 14.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-11112	Support the provision	No specific decision sought for Policy 16.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-11113	Support the provision	No specific decision sought for Policy 17.
3.11.4.1 Working with others	PC1-11114	Support the provision	No specific decision sought for Method 3.11.4.1.
3.11.4.2 Certified Industry Scheme	PC1-11115	Support the provision with amendments	Provide further and better particulars regarding the process and timing for the establishment of Certified Industry Schemes, including a commitment that these will be listed/available on the Waikato Regional Council website by 22 October 2017. AND provide further and better particulars regarding criteria for certifying industry schemes. AND refer to relief sought for Rule 3.11.5.3 and Rule 3.11.5.4.
3.11.4.3 Farm Environment Plans	PC1-11117	Support the provision with amendments	Provide further and better particulars regarding Waikato Regional Council's expectations as to standard and content. AND refer to relief sought regarding farming activity rules.
3.11.4.5 Sub-catchment scale planning	PC1-11121	Support the provision	RETAIN Method 3.11.4.5.
3.11.4.6 Funding and implementation	PC1-11122	Support the provision with amendments	AMEND Method 3.11.4.6 to include reference to Waikato Regional Council providing a fund to assist land owners, including financial incentives to re-purpose or retire land.
3.11.4.7 Information needs to support any future allocation	PC1-11123	Not stated	No specific decision sought.
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-11183	Not stated	No specific decision sought.
3.11.4.10 Accounting system and monitoring	PC1-11184	Not stated	No specific decision sought.
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-11185	Not stated	No specific decision sought.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-11186	Not stated	No specific decision sought for Method 3.11.4.12.
3.11.5 Rules	PC1-11070	Support the provision with amendments	AMEND PPC1 to clarify the type of resource consent which must be applied for in respect of its proposed new rules.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-11187	Not stated	No specific decision sought.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-11188	Oppose the provision with amendments	AMEND Rule 3.11.5.2(4) as follows: "c. No part of the property or enterprise over <del>15</del> <u>23</u> 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..."
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-11189	Oppose the provision with amendments	Refer to relief elsewhere regarding certainty and implementation of PPC1 methods.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-11190	Oppose the provision with amendments	Refer to relief elsewhere regarding certainty and implementation of PPC1 methods.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-11191	Support the provision with amendments	Refer to relief cited elsewhere regarding certainty and implementation of PPC1 methods.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-11192	Oppose the provision	AMEND existing Rule 3.11.5.7 to read: <u>"The following activities which do not comply with the standards and terms of rule(s) 3.11.5.7A are non-complying activities:</u> <u>Changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the Waikato and Waipā catchments where prior to 1 July 2026 the change exceeds a total of 4.1 hectares..."</u> ADD a NEW restricted discretionary activity rule to read: <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, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares is a Restricted Discretionary Activity (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>4. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5.</u> <u>Subject to the following standards and terms:</u> <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 loss for the property or enterprise over the 5 year period ending 30 June of the preceding year that the application is made.</u> <u>b) Cattle, horses, deer and pigs are excluded from water bodies in accordance with Schedule C.</u>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>Waikato Regional Council restricts its discretion over the following matters:</p> <p><u>i. Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers.</u></p> <p><u>ii. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens.</u></p> <p><u>iii. The need for and the content of a Farm Environment Plan, including the use of offset mitigation measures.</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>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>
Schedule A - Registration with Waikato Regional Council	PC1-11193	Support the provision with amendments	Provide further and better particulars of how the registration process will operate, including through amendment to the methods described in PPC1.
Schedule B - Nitrogen Reference Point	PC1-11194	Oppose the provision with amendments	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.
Schedule C - Stock exclusion	PC1-11195	Support the provision with amendments	AMEND to clarify the relationship/interpretation of the stock exclusion requirements between Schedule C and Schedule 1 Farm Environment Plans.
Schedule 1 - Requirements for Farm Environment Plans	PC1-11196	Support the provision with amendments	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. AND AMEND to clarify the relationship/interpretation of the stock exclusion requirements between Schedule C and Schedule 1 Farm Environment Plans.
Schedule 2 - Certification of Industry Schemes	PC1-11197	Support the provision with amendments	AMEND PPC1 to include better and further particulars regarding the approval and operation of Certified Industry Schemes.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-11198	Support the provision with amendments	AMEND Table 3.11-1 so that the provisions clearly set out how the attributes in Table 3.11-1 will be implemented, particularly in the context of resource consent applications for farming activities. AND grant relief sought regarding land use change, land use flexibility and off-set mitigation, as detailed elsewhere in the submission.
Definition - Arable cropping	PC1-11199	Support the provision with amendments	AMEND the definition of arable cropping to clarify that Rule 3.11.5.7 does not include the rotation of crops and stock grazing on a seasonal basis, which forms part of day to day farming activities.
Definition - Best management practice	PC1-11200	Support the provision with amendments	AMEND definition to read as follows (or similar wording to address reason for submission): "Best management practice/s: For the purposes of Chapter 3.11, means maximum feasible mitigation to reduce the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens from land use activities given current technology. <u>This includes off-set mitigation techniques implemented across an enterprise."</u>
Definition - Certified Farm Environment Planner	PC1-11201	Support the provision with amendments	AMEND PPC1 to include better and further particulars regarding the certification of Certified Farm Environment Planners and expected timing for certification/listing on the Waikato Regional Council website.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Definition - Certified Industry Scheme	PC1-11202	Support the provision with amendments	AMEND PPC1 to include better and further particulars regarding the timing, certification and implementation of Certified Industry Schemes.
Definition - Enterprise	PC1-11203	Oppose the provision with amendments	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): "Enterprise/s: means one or more parcels of land held in single or multiple ownership <u>under the ultimate common control of one owner or entity</u> to support the principal land use, <u>which may include more than one dairy unit</u> , 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, <u>except that where the enterprise falls within more than one sub-catchment it may nevertheless be treated as a single enterprise if the land parcels are contiguous.</u> "
Definition - Nitrogen Reference Point	PC1-11204	Support the provision with amendments	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 provide information on how it will ensure consistency for the purposes of Nitrogen Reference Point reporting, implementation, and 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.
Definition - Offset	PC1-11205	Support the provision with amendments	RETAIN definition for offset/s, subject to relief sought above regarding definition of Best Management Practice.

## South Farms Ltd

Submitter ID: 71662

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7308	Oppose the provision	No specific decision requested for PPC1.

## South Waikato District Council

Submitter ID: 72892

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-3759	Support the provision with amendments	WITHDRAW PPC1 to provide time for a targeted approach to identify all impacts on sub-catchments and communities together with rules and alternative methods of implementation, to promote sustainable community and sub-catchment solutions.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			OR AMEND to ensure PPC1 satisfies the requirements of section 32 RMA to provide provisions that are understandable, practicable, cost effective and fair with their implementation to achieve an effects based resource management framework. AND AMEND to ensure effects based rules are used to regulate land use practices and activities that are in proportion to the conditions or scale of the environmental effects being addressed. AND CONSIDER undertaking a comparison of PPC1 against other similar plan changes in New Zealand in order to establish the most efficient and effective suite of methods to implement the Vision and Strategy.
3.11.2 Objectives	PC1-4029	Oppose the provision with amendments	AMEND to set realistic Objectives that acknowledge the intergenerational time period will likely be at least 80 years.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-4031	Support the provision	RETAIN Objective 2.
Objective 3: 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	PC1-4032	Oppose the provision with amendments	REPLACE Objective 3 with: " <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 Table 3.11-1 in the period desirably to 2036.</u> "
Objective 4: People and community resilience	PC1-4034	Oppose the provision with amendments	AMEND Objective 4 to read: "A staged approach to <u>land use change enables people and communities to undertake adaptive management to continue to provide for their</u> 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.
3.11.3 Policies	PC1-4035	Oppose the provision with amendments	AMEND policies to improve clarity and certainty for their application in decision making on resource consents.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-4036	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.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-4039	Support the provision with amendments	AMEND Policy 2(c) to read: "c. Establishing a Nitrogen Reference Point for a property or enterprise <u>based on using industry or sector group accepted models or similar...</u> "
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12922	Support the provision with amendments	AMEND Policy 2(e) to read: "e. Requiring stock exclusion to be completed within <del>3 years following the dates by which the timeframes set out in a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026.</del> "
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-4040	Support the provision with amendments	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> "

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			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.
Policy 5: Staged approach	PC1-4041	Support the provision	AMEND Policy 5 to read "...targets set out in Table 11-1 will need to be staged over <u>at least 80 years...</u> " AND AMEND to read: "...to minimise social disruption <u>on a sub-catchment or catchment basis...</u> "
Policy 6: Restricting land use change	PC1-4042	Oppose the provision	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.'
Policy 7: Preparing for allocation in the future	PC1-4044	Oppose the provision with amendments	DELETE the first paragraph of Policy 7  AND AMEND the sentence commencing 'Any future allocation should consider...' to incorporate the footnote. AND RETAIN clause c. AND AMEND to ensure the matters listed under Policy 16 i-iii are consistent with and reflected in Policy 7.
Policy 8: Prioritised implementation	PC1-4046	Oppose the provision with amendments	AMEND Policy 8 to remove the uncertainty over interpretation and application of its provisions.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-4055	Support the provision with amendments	AMEND Policy 9(a) to read: "Engaging early with <u>local authorities</u> , tangata whenua and with land owners, communities..."
Policy 10: Provide for point source discharges of regional significance	PC1-4056	Support the provision with amendments	RETAIN Policy 10. AND 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 regionally significant industry: " <u>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> <u>a) Dairy manufacturing sites;</u> <u>b) Meat processing plants; and</u> <u>c) Pulp and paper processing plants.'</u> "
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-4059	Support the provision with amendments	AMEND Policy 11 to clarify that the principle of the point source discharger being able to implement offset measures is: as part of measures to avoid, remedy or mitigate adverse effects, to be in alternative locations and or sub-catchments, that are available for more than one type of contaminant and can be staged over the period of the resource consent.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-4091	Oppose the provision with amendments	AMEND Policy 12 to read: " <u>When considering consent applications for point source discharges, consider the contribution made...</u> "

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 13: Point sources consent duration	PC1-4095	Oppose the provision with amendments	AMEND Policy 13(a) to read: "When determining an appropriate duration for any consent granted consider the following matters: a. A consent term exceeding <del>25</del> <u>30</u> years, where..." AND AMEND Policy 13(b) to read: "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 <u>while taking into account the timing and cost to the communities associated with implementing such measures.</u> "
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-4098	Support the provision with amendments	AMEND Policy 16 to ensure the intention and scope of the policy is clear AND AMEND to ensure that the matters listed under i-iii are consistent with Policy 7.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-4101	Oppose the provision with amendments	AMEND Policy 17 to ensure the intention and scope of the policy is clear.
3.11.4.1 Working with others	PC1-4103	Support the provision	RETAIN Method 3.11.4.1.
3.11.4.6 Funding and implementation	PC1-4104	Support the provision with amendments	ADD a NEW clause to Method 3.11.4.6 to read: " <u>c. Work with territorial authorities to examine options for and to implement contaminant reduction measures associated with point source discharge consents for infrastructure services that are affordable to local communities.</u> " AND ADD a NEW clause to Method 3.11.4.6 to read: " <u>d. Provide financial support for the reviews of District Plans that aim to achieve the alignment of district and regional planning provisions that give effect to the Vision and Strategy.</u> "
3.11.5 Rules	PC1-4175	Oppose the provision with amendments	AMEND Rules 3.11.5 to ensure they are understandable, robustly formulated, practical and able to be implemented by land owners and managers to achieve compliance and enforceable by the regulator. 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.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-4177	Support the provision with amendments	AMEND Rule 3.11.5.1(4) to read: "4. The farming activities do not form part of an enterprise being undertaken on more than one property <u>within the Waikato River and or Waipā River catchments.</u> " AND AMEND 3.11.5.1(5) to clarify the meaning of: 'grazed land' to mean land that is fenced and in pasture throughout most/all of the year AND provide evidence that the section 32 rationale confirms 6 stock units per hectare is the preferred approach to adopt to achieve the objectives of the Vision and Strategy AND review 3.11.5.1(6) as to the reasons for the adoption of this performance standard AND provide evidence that the approach taken in 3.11.5.1(6) meets the section 32 efficiency and effectiveness tests, otherwise REMOVE the standard AND AMEND 3.11.5.1(7) to read: "7. The farming activities do not form part of an enterprise being undertaken on more than one property <u>within the Waikato River and or Waipā River catchments.</u> " 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.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-4206	Support the provision with amendments	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 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> " 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.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-4216	Oppose the provision with amendments	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.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-4220	Oppose the provision	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 groups and communities to provide alternative practicable measures to achieve the same environmental outcomes.
Schedule A - Registration with Waikato Regional Council	PC1-4115	Oppose the provision with amendments	AMEND in Schedule A the 2 hectare threshold to a higher minimum property area threshold for reporting purposes, such as 10 hectares AND AMEND Schedule A to clarify what type and level of information is required by clause 5(d) AND AMEND Schedule A to provide guidance on the interpretation of clause 5(f) to assist landowners to understand and meet these standards AND AMEND to provide guidance on mapping requirements to assist landowners to understand and meet clause 6 AND AMEND to provide evidence that the section 32 evaluation confirms clause 5(f) the preferred approach to adopt to achieve the objectives of the Vision and Strategy.
Schedule B - Nitrogen Reference Point	PC1-4161	Oppose the provision with amendments	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.
Schedule C - Stock exclusion	PC1-4169	Oppose the provision	Provide evidence that the section 32 evaluation confirms efficiency and effectiveness of this Schedule C. Work with landowners, sector groups and communities to provide alternative practicable measures to achieve the same environmental outcomes. AND DELETE Schedule C clause 2.
Schedule 1 - Requirements for Farm Environment Plans	PC1-4171	Oppose the provision with amendments	Provide evidence that the section 32 evaluation confirms Schedule 1 is the preferred approach to adopt regarding the efficiency and effectiveness of this method and rule

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to work with landowners, sector groups and communities to provide alternative practicable measures to achieve the same environmental outcomes.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12522	Oppose the provision with amendments	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.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12523	Oppose the provision with amendments	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).
Schedule 2 - Certification of Industry Schemes	PC1-9735	Oppose the provision	No specific decision sought for Schedule 2.
Additions to Glossary of Terms	PC1-9724	Support the provision with amendments	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 regionally significant industry: " <u>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) Dairy manufacturing sites; b) Meat processing plants; and c) Pulp and paper processing plants."

## Spectrum Dairies Limited Partnership

Submitter ID: 73958

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.1 Values and uses for the Waikato and Waipa Rivers	PC1-2718	Support the provision with amendments	RETAIN the intent of Objective 1 AND AMEND to divide the region into sub-catchments which include all the region's diversity to ensure the water quality targets are achievable in the timeframe AND AMEND to clarify how to mitigate the effects of certain farming practices and the sensitivities of certain areas (swamps, soil types) on the water that enters the tributaries.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-2706	Support the provision with amendments	RETAIN the intent of Objective 1 AND AMEND to divide the region into sub-catchments which include all the region's diversity to ensure the water quality targets are achievable in the timeframe AND AMEND to clarify how to mitigate the effects of certain farming practices and the sensitivities of certain areas (swamps, soil types) on the water that enters the tributaries.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-2721	Support the provision with amendments	AMEND PPC1 to provide a greater emphasis on understanding that the economic effects of imposing a rule may affect achievement of the objective AND AMEND to find a pathway for farmers to address the environmental issues whilst still being capable of operating a viable and healthy business.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 3: 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	PC1-2739	Oppose the provision with amendments	Objective 3: CONSIDER undertaking more work to assess existing information to ensure PPC1 measures and assumptions are correct.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-2741	Oppose the provision with amendments	Policy 1: AMEND PPC1 to provide greater clarity for farms and more objectivity regarding land use change AND AMEND Policy 1 to reconsider the economic outfall and value loss from people leaving farming AND AMEND to include logical solutions that have positive economic and environmental effects AND undertake wider consultation, on a farm by farm basis.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-2752	Oppose the provision with amendments	Policy 2: AMEND PPC1 to provide greater clarity for farms and more objectivity regarding land use change AND AMEND Policy 2 to reconsider the economic outfall and value loss from people leaving farming AND AMEND to include logical solutions that have positive economic and environmental effects AND undertake wider consultation, on a farm by farm basis.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-2754	Oppose the provision with amendments	Policy 3: AMEND PPC1 to provide greater clarity for farms and more objectivity regarding land use change AND AMEND Policy 3 to reconsider the economic outfall and value loss from people leaving farming AND AMEND to include logical solutions that have positive economic and environmental effects AND undertake wider consultation, on a farm by farm basis.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-2757	Oppose the provision with amendments	Policy 4: AMEND PPC1 to provide greater clarity for farms and more objectivity regarding land use change AND AMEND Policy 4 to reconsider the economic outfall and value loss from people leaving farming AND AMEND to include logical solutions that have positive economic and environmental effects AND undertake wider consultation, on a farm by farm basis
Policy 5: Staged approach	PC1-2760	Oppose the provision with amendments	Policy 5: AMEND PPC1 to provide greater clarity for farms and more objectivity regarding land use change AND AMEND Policy 5 to reconsider the economic outfall and value loss from people leaving farming AND AMEND to include logical solutions that have positive economic and environmental effects AND undertake wider consultation, on a farm by farm basis
Policy 6: Restricting land use change	PC1-2762	Oppose the provision with amendments	Policy 6: AMEND PPC1 to provide greater clarity for farms and more objectivity regarding land use change AND AMEND Policy 6 to reconsider the economic outfall and value loss from people leaving farming AND AMEND to include logical solutions that have positive economic and environmental effects AND undertake wider consultation, on a farm by farm basis.
Schedule 1 - Requirements for Farm Environment Plans	PC1-2763	Support the provision with amendments	AMEND Schedule 1 to make Farm Environment Plans more like farm business plans that embrace positive change for better business rather than being regulated.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12524	Support the provision with amendments	AMEND Schedule 1 by taking a different approach to ascertain the base line and consider the management changes required to improve

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to use planning and logic to enable changes in farming practice such as land use change that reduces contaminant discharge in sensitive areas but increases it in less sensitive areas to achieve an economic and environmental benefit.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12525	Oppose the provision	Schedule 1 - DELETE the requirement to be held at or below a property's Nitrogen Reference Point.

## Speedy, Michael Weston

Submitter ID: 74081

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-3762	Oppose the provision	DELETE PPC1 OR if not deleted AMEND PPC1 to address land use, compliance cost, Farm Environment Plans, Nitrogen Reference Points and grandparenting, topography and fencing setbacks, sediment including urban runoff and that the plan is sub-catchment specific with responses relative to measured data.

## Spring Sheep Dairy NZ LP

Submitter ID: 73521

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6495	Not stated	AMEND PPC1 to clarify what the provisions and time-frames will be for sheep dairy.

## Stachurski, Wayne Michael

Submitter ID: 73343

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-4344	Oppose the provision	AMEND Objective 1 to align target settings for phosphorus, sediment and E.coli with National Policy guidelines.
Policy 10: Provide for point source discharges of regional significance	PC1-4346	Oppose the provision	Ensure all contributors to point source discharges, including significant infrastructure and industry, provide plans for either future mitigation or offset measures. Policy 10



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-4347	Oppose the provision	Ensure all contributors to point source discharges, including significant infrastructure and industry, provide plans for either future mitigation or offset measures. Policy 11
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-4349	Oppose the provision	AMEND Policy 16 so that all properties are treated alike. AND AMEND PPC1 so rules are set for individual properties to attain targets for the farm or sub-catchments.
3.11.5 Rules	PC1-4342	Oppose the provision	No specific decision sought for the Rules.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-4351	Oppose the provision	AMEND Rule 3.11.5.2 to clarify and extend.
Schedule A - Registration with Waikato Regional Council	PC1-4348	Support the provision	AMEND Schedule A to include a new clause: " <u>Under no circumstance shall disclosure of financial details ever be required</u> " OR similar.
Schedule B - Nitrogen Reference Point	PC1-4480	Oppose the provision	No specific decision sought for Schedule B.

## Stark, Steven and Theresa

Submitter ID: 73721

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-5175	Oppose the provision with amendments	WITHDRAW PPC1 or place on hold until the north-eastern catchment is reinserted into the plan which in time the plan can be notified as a whole AND AMEND PPC1 by including new and amending existing objectives, policies, methods and rules to enable catchment groups to manage their land and water resources to achieve water quality outcomes while providing for their economic and social well-being and sustainability AND CONSIDER undertaking further Section 32 evaluation on PPC1 which the public is currently submitting on.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-5029	Support the provision with amendments	DELETE reference to Table 3.11-1 under Objective 1 and substitute the minimum standards as set out in the Ministry for the Environment's <i>Clean Water</i> document published February 2017. And within the National Objectives Framework in the National Policy Statement for Freshwater Management 2014. AND AMEND Objective 1 to allow movement of water quality within a band. AND AMEND so standards do not have to be upheld during flood events.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-5033	Support the provision with amendments	AMEND Objective 2 to read: "Social, Economic and Cultural well-being is continuously maintained <del>in the long term</del> . <u>Where there are negative economic impacts for the public good, public funding must be supplied</u> or words to that effect."

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 3: 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	PC1-5048	Support the provision with amendments	AMEND Objective 3 by substituting Table 3.11-1 with the minimum standards as set out in Ministry for the Environment's Clean Water document published February 2017 and within the National Objectives Framework in the National Policy Statement for Freshwater Management 2014. DELETE the entire paragraph AND REPLACE text to read: <u>"Put in place measuring and monitoring mechanisms to 2026 to inform the reduction of discharges, where needed, of nitrogen, phosphorus, sediment and microbial pathogens."</u> AND AMEND by allowing movement of water quality within a band.
Objective 4: People and community resilience	PC1-5049	Support the provision with amendments	AMEND Objective 4 by deleting Table 3.11-1 and substituting the minimum standards as set out in the Ministry for the Environment's Clean Water document published February 2017. AND AMEND by adding the following to Objective 4 to read as: <u>"Where there are negative economic impacts on landowners for the public good, public funding must be supplied."</u> DELETE Clause B and require no further cost requirements on landowners for 25 years in order for them to afford the costs of significant investments required under PPC1.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-5075	Oppose the provision	DELETE Objective 5 in its entirety.
3.11.3 Policies	PC1-5156	Support the provision	ADD a NEW Policy to PPC1 which provides for economic, social and cultural certainty for landowners dealing with diffuse discharges, and provides a minimum of 25 years for a resource consent and/or Farm Environment Plan.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12656	Support the provision with amendments	AMEND Policy 1 to read: <del>"Manage and require reductions in sub-catchment wide discharges of nitrogen, phosphorus, sediment and microbial pathogens, by:</del> a) Enabling activities with a low level of contaminant discharge to water bodies <del>provided those discharges do not increase;</del> "
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-5077	Support the provision with amendments	ADD the following to Policy 1: <u>"d) as per standards set out in Ministry for the Environment's Clean Water document published. Feb 2017, publication number ME 1293; and within the National Objectives Framework in the National Policy Statement for Freshwater Management 2014."</u>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-5084	Oppose the provision	DELETE Policy 2 in its entirety. AMEND by not implementing PPC1 until sound scientific data has been collected as to the water quality issues in each sub-catchment.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-5092	Oppose the provision	DELETE Policy 3 in its entirety.
Policy 4: Enabling activities with lower discharges to continue or to be	PC1-5103	Support the provision with amendments	AMEND Policy 4 to read: <del>"Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future".</del>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
established while signalling further change may be required in future			
Policy 5: Staged approach	PC1-5105	Support the provision with amendments	DELETE reference to Table 3.11-1 under Policy 5 and substitute the minimum standards as set out in the Ministry for the Environment's Clean Water document published February 2017, publication number ME 1293; and within the National Objectives Framework in the National Policy Statement for Freshwater Management 2014. AND AMEND by allowing movement of water quality within a band. AND AMEND so that standards do not have to be upheld during flood events.
Policy 6: Restricting land use change	PC1-5110	Oppose the provision	DELETE Policy 6 in its entirety.
Policy 7: Preparing for allocation in the future	PC1-5112	Support the provision with amendments	AMEND Policy 7 as follows: "Preparing for possible allocation in the future, any future allocation should consider the following principles:" DELETE Clause b) under Policy 7. AND AMEND Footnote 5 to read: "For the avoidance of doubt, Land suitability criteria <del>exclude</del> include current land use and current water quality, the moderating effects of potential mitigations and non-biophysical criteria (economic, social and cultural). <del>Instead these factors will be of importance in analysing the implications of a completed land suitability classification.</del> " AND AMEND by inserting the following to read: "d) Possible future allocation decisions should take advantage of new data and knowledge."
Policy 8: Prioritised implementation	PC1-5124	Oppose the provision	DELETE Policy 8 in its entirety. AMEND Policy 8 by DELETING Table 3.11-1 by replacing the minimum standards as set out in the Ministry for Environment's Clean Water document published February 2017, publication number ME 1293.
Policy 14: Lakes Freshwater Management Units	PC1-5129	Support the provision	RETAIN Policy 14 in its current form.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-5132	Oppose the provision	DELETE Policy 16 in its entirety.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-5148	Oppose the provision	DELETE Policy 17 in its entirety.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-5167	Oppose the provision with amendments	AMEND Rule 3.11.5.1 to read: "3.11.5.1 Permitted Activity Rule- Small <del>and or</del> Low Intensity farming activities. 3.11.5.1 5) For grazed land, the stocking rate of the land is less than € 18 units per hectare; and"
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-5177	Oppose the provision with amendments	AMEND Rule 3.11.5.2 as follows: "... and has more than €18 stock units per hectare 4. c) No part of the property or enterprise over 15 degrees slope is <del>cultivated or grazed</del> <u>arable cropped</u> ".

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND Rule 3.11.5.2 by DELETING any standards or clauses which hold land uses to historic discharge levels or stocking rates.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-5183	Oppose the provision with amendments	DELETE 3.11.5.4 iii and 3.11.5.4 iv. AND AMEND the term of a resource consent and/or Farm Environment Plan will be a minimum of 25 years.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-5192	Oppose the provision	DELETE Rule 3.11.5.7 in its entirety.
Schedule B - Nitrogen Reference Point	PC1-5205	Oppose the provision	AMEND Schedule B to add the following: <u>"Farmers will farm to best practice. OVERSEER will be used as an informative, not regulatory, tool at the property level to assist in information gathering for future plan changes."</u>
Schedule C - Stock exclusion	PC1-5223	Oppose the provision with amendments	AMEND Schedule C by using the minimum standards for stock exclusion as set out in Ministry for the Environment's Clean Water document published February 2017, publication number ME 1293.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12526	Oppose the provision with amendments	Schedule 1 - DELETE the use of OVERSEER as a regulatory tool. If Nitrogen Reference Points are able to be used as a limiting factor at property level, the 5 year rolling average is to be retained.
Schedule 1 - Requirements for Farm Environment Plans	PC1-5228	Oppose the provision with amendments	AMEND Schedule 1 by amending Farm Environment Plan requirements to change threshold for mandatory stock exclusion to the minimum standards for stock exclusion as set out in Ministry for the Environment's Clean Water document published February 2017 publication number ME 1293.
Schedule 2 - Certification of Industry Schemes	PC1-5236	Oppose the provision with amendments	AMEND Schedule 2 by replacing all water quality targets with the minimum standards for stock exclusion as set out in the Ministry for the Environment's Clean Water document published February 2017, publication number ME 1293; and within the National Objectives Framework in the National Policy Statement for Freshwater Management 2014. AND AMEND by allowing movement of water quality within a band. AND AMEND Schedule 2 to read: <u>"1.b) the purposes of Policy 2 or 3; Measure and monitor for the first 10 years."</u>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-5032	Oppose the provision	DELETE Table 3.11-1 and substitute the minimum standards as set out in the Ministry for the Environment's <i>Clean Water</i> document published February 2017. and within the National Objectives Framework in the National Policy Statement for Freshwater Management 2014. AND AMEND by allowing movement of water quality within a band. AND AMEND so standards do not have to be upheld during flood events.

## Steele, Brian and Debbie

Submitter ID: 72946

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4502	Support the provision with amendments	No specific decision sought for PPC1.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-4490	Support the provision with amendments	Provide national limits for E.coli, nitrogen and phosphorus in waterways. Rule 3.11.5.2.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-4491	Support the provision with amendments	AMEND 3.11.5.3 stock exclusion standards to ensure that permanent waterways wider than 1 metre are fenced.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-4494	Support the provision with amendments	No specific decision sought for Rule 3.11.5.6.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-4501	Support the provision with amendments	No specific decision sought for Rule 3.11.5.7.
Schedule B - Nitrogen Reference Point	PC1-4482	Oppose the provision	AMEND Schedule B to extend the timeframe for determining a Nitrogen Reference Point.
Schedule C - Stock exclusion	PC1-4483	Oppose the provision with amendments	AMEND Schedule C to extend the proposed date of implementation to allow time to research the proposed outcomes and implementation of new standards for stock exclusion.

## Steffert, MP

Submitter ID: 74093

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4857	Oppose the provision	AMEND PPC1 to focus on farms that are overstocking. AND AMEND PPC1 to target rules to urban areas as well. AND AMEND PPC1 to reduce costs to farmers.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-4859	Oppose the provision	DELETE Objective 5 in its entirety.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-4860	Oppose the provision	DELETE Policy 16.
Schedule B - Nitrogen Reference Point	PC1-4856	Oppose the provision	AMEND Schedule B and the Nitrogen Reference Point so heavy nitrogen users are targeted.

## Stevenson Resources Limited

Submitter ID: 73732

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-5023	Support the provision	AMEND Objective 2 to read: "Objective 2: Social, economic and cultural well-being...Waikato and Waipā communities and their economy benefit from the restoration and protection of water quality in the Waikato River catchment, <del>which</del> <u>and the restoration and protection is undertaken in a way and at a rate that</u> enables the people and communities to continue to provide for their social, economic and cultural well-being."
Objective 3: 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	PC1-5024	Support the provision	AMEND Objective 3 to read: "Objective 3:...Actions put in place and implemented by 2026 to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, <del>are sufficient to</del> achieve ten percent of the required change between current water quality and the 80-year <u>desired</u> water quality <del>states</del> <u>attribute</u> <del>targets</del> in Table 3.11-1. 1. A ten percent change towards the long term <u>desired</u> water quality <del>states</del> <u>improvements</u> is indicated by Objective 3 <del>the short term water quality attribute</del> <u>targets</u> in Table 3.11-1."
Objective 4: People and community resilience	PC1-5025	Support the provision	AMEND Objective 4 to read: "A staged approach ... while: 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> <del>the attribute</del> <u>targets</u> for the Waikato and Waipā Rivers in Table 3.11-1; and..."
Policy 10: Provide for point source discharges of regional significance	PC1-5026	Support the provision	AMEND Policy 10 to read: "Policy 10: Provide for point source discharges <u>from activities</u> of regional significance. When deciding resource consent applications... to water and onto or into land, <u>subject to Policy 11 and Policy 12</u> provide for the: a) Continued operation <u>and development</u> of regionally significant infrastructure; and b) Continued operation <u>and development</u> of regionally significant industry." AND ADD a definition of regionally significant industry [submission point glossary of terms].
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-5027	Support the provision	AMEND Policy 11 to read: "Policy 11: Application of Best Practicable Option <del>and mitigation or offset of effects</del> to point source discharges. Require any person undertaking a point source discharge of nitrogen, phosphorus, sediment or microbial pathogens to water or onto or into land in the Waikato and Waipā River catchments to adopt the Best Practicable Option to avoid or mitigate the adverse effects of the discharge, at the time a resource consent application is decided. Policy 11A: Offsetting the effects of point source discharges. Where it is not practicable to avoid or mitigate <del>all</del> <u>any significant</u> adverse effects, an <u>offset</u> measure may be proposed in an alternative location or locations to the <u>point source discharge</u> , <del>for the purpose of ensuring positive effects on the environment to lessen any residual adverse effects of the discharge(s) that will or may result from allowing the activity</del> provided that the : a) <del>The primary</del> <u>Primary</u> discharge does not result in any significant toxic adverse effect at the point source discharge location; and b) The <del>offset</del> <u>Offset</u> measure is for the same contaminant; and c) The <del>offset</del> <u>Offset</u> measure occurs <u>preferably</u> within <del>the same or</del> <u>upstream of the</u> sub-catchment in which the primary discharge occurs <del>and if this is not practicable, then within the same Freshwater Management Unit</del> <u>or a Freshwater Management Unit</u> <del>located upstream</del> ; and <u>d) The offset measure is monitored and results in a net reduction in adverse environmental effects on the Waikato or Waipā River catchment caused by nitrogen, phosphorus, sediment and/or microbial pathogens; and</u>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			e) The <del>offset</del> Offset measure remains in place for the duration of the consent and is secured by consent condition <u>or another legally binding mechanism.</u> "
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-5028	Support the provision	AMEND Policy 12 to read: "Policy 12: Additional considerations for point source discharges in relation to water quality targets. <del>Consider</del> <u>Assess</u> the contribution made by a point source discharge to the, nitrogen, phosphorus, sediment and microbial pathogen catchment loads and the impact of that contribution on the likely achievement of <del>the short-term or targets</del> <sup>A</sup> in Objective 3 or the progression towards the <u>desired</u> 80 year <u>water quality states targets</u> <sup>A</sup> in Objective 1, taking into account... c. The ability to stage future mitigation actions to allow investment costs to be spread over time and <del>contribute to meet meeting Objectives 1 and 3</del> <u>the water quality targets specified above</u> ; and..."
Policy 13: Point sources consent duration	PC1-5747	Support the provision	AMEND Policy 13 to read: "Policy 13: Point sources consent duration when determining an appropriate duration for any consent granted, consider the following matters: a) A consent term <del>exceeding 25 of 35</del> years, where the applicant demonstrates <del>the approaches set out in that</del> Policies 11, <u>11A</u> and 12; will be <del>met</del> <u>complied with</u> ; and..."
Discharges	PC1-5749	Support the provision with amendments	AMEND the Consequential amendments 3.5 Discharges - Background and Explanation to read: " <del>Discharges in the Waikato and Waipā River Catchments associated with Farming Land Use.</del> Chapter 3.11 addresses the use of land for farming in the Waikato and Waipā River catchments including associated diffuse <u>discharges of nitrogen, phosphorus, sediment and microbial pathogens.</u> <u>Chapter 3.11 also contains objectives and policies that apply to point source discharges to land and water in the Waikato and Waipā River catchments.</u> "
Glossary of Terms	PC1-5748	Support the provision	ADD to the Glossary of terms a definition of regionally significant industry that reads: " <u>Regionally significant industry: 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> "

## Stewart, Garry

Submitter ID: 71215

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-1457	Oppose the provision	No specific decision sought for PPC1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-2016	Oppose the provision	No specific decision sought for Policy 2.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-1459	Oppose the provision	No specific decision sought for Schedule B.
Schedule C - Stock exclusion	PC1-1456	Oppose the provision	DELETE Schedule C.

## Stewart, Mark

Submitter ID: 71411

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-11165	Not stated	No specific decision was requested for PPC1.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-951	Oppose the provision with amendments	<p>AMEND Rule 3.11.5.3 as requested by Federated Farmers in their submission.  [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is:  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:  <u>"The use of land for farming activities (excluding commercial vegetable production) where the property area is greater than 4.1 hectares is a Permitted Activity provided that:</u>  <u>1) The change in the use of land is not from non-milking dairy farming to milking dairy farming; or</u>  <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>  <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>  AND AMEND PPC1 so that normal farming activities in rural areas are permitted activities.  AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities.]</p>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-952	Oppose the provision with amendments	<p>AMEND Rule 3.11.5.4 as requested by Federated Farmers in their submission.  [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is:  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:</p>



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p><u>"The use of land for farming activities (excluding 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. AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities.]</p>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-953	Oppose the provision with amendments	<p>AMEND Rule 3.11.5.7 as requested by Federated Farmers in their submission. [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>
Schedule B - Nitrogen Reference Point	PC1-954	Oppose the provision with amendments	<p>AMEND Schedule B as requested by Federated Farmers in their submission. [AND AMEND to ensure that the purpose for which information in Schedule B is being sought is clearly stated in Schedule B AND AMEND to ensure that it is within Councils powers to seek all of the information sought in Schedule B AND AMEND to ensure that the information sought by Council is no more than is necessary to achieve the purposes for which it is sought AND AMEND to ensure that the requirements set out in Schedule B match the Policies, Methods, definitions, etc. to which Schedule B relates.]</p>
Schedule C - Stock exclusion	PC1-955	Oppose the provision with amendments	<p>AMEND Schedule C as requested by Federated Farmers in their submission. [AMEND Schedule C 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 C 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 C match the Policies, Methods, definitions, etc. to which Schedule C relates AND REMOVE requirements for fencing off water bodies AND AMEND to adopt the Government's Clean Water Package 2017 stock exclusion standards as an interim measure AND DEVELOP more detailed proposals at a sub-catchment level later, through a freshwater management unit based assessment, and implemented then through a sub-catchment based plan change AND MAKE any consequential amendments to PPC1.]</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-956	Oppose the provision with amendments	<p>AMEND Schedule 1 as requested by Federated Farmers in their submission. [AMEND Schedule 1 to ensure that the purpose for which information is being sought is clearly stated. AND ENSURE that it is within Council's powers to seek all of the information sought in Schedule 1</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			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.]

## St George, Peter

Submitter ID: 74498

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-10194	Oppose the provision	AMEND PPC1 to trigger any cap on nutrient use only once a farm's soil tests, which are done every 2 years, reach optimum levels. AND AMEND PPC1 to use a sub-catchment approach that deals with the contaminants in each particular catchment.
Schedule C - Stock exclusion	PC1-10197	Oppose the provision	AMEND Schedule C to require stock exclusion only on those streams that can be fenced without the need for extensive earthworks.

## ST Growers Ltd

Submitter ID: 67421

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Background and explanation	PC1-1276	Oppose the provision	AMEND Background and explanation to ensure PPC1 allows for alternative modelling methods which may prove to be more suitable in the future for the use on commercial vegetable production.
Policy 6: Restricting land use change	PC1-1280	Oppose the provision	AMEND Policy 6 to change non-complying activity into a restricted discretionary activity where the land use change can show decreases in discharges when compared to the current activity.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-1287	Oppose the provision with amendments	AMEND Rule 3.11.5.5 to ensure PPC1 allows for alternatives modelling methods to OVERSEER which may prove to be more suitable in the future for the use on commercial vegetable production.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-1275	Oppose the provision	AMEND Rule 3.11.5.7 to make land use change for commercial vegetable production a restricted discretionary activity on new and additional production, instead of a non-complying activity, when it can be shown the discharge of contaminants is equal to or less than the existing land use.
Schedule B - Nitrogen Reference Point	PC1-1289	Oppose the provision with amendments	AMEND Schedule B to ensure PPC1 allows for alternative modelling methods to OVERSEER which may prove to be more suitable in the future for the use on commercial vegetable production.

## Stobie, Duncan, Loraine, Donald and Craig

Submitter ID: 73998

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6543	Support the provision with amendments	AMEND PPC1 following a conversation and agreement between the rural and urban communities about a balance between environmental protection and regional prosperity.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-5150	Oppose the provision with amendments	AMEND Objective 2 to provide for a high regard for the ability of communities to thrive and prosper.
Objective 4: People and community resilience	PC1-5151	Oppose the provision with amendments	AMEND Objective 4 to provide for a high regard for the ability of communities to thrive and prosper.
Policy 6: Restricting land use change	PC1-5147	Oppose the provision with amendments	AMEND Policy 6 to provide for more discretion through management of nutrients via the farm plan rather than through the need for additional consents.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-5152	Oppose the provision with amendments	AMEND Policy 9 to provide more detailed water testing to be done in the sub-catchments before some of the rules come into place.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-5154	Support the provision with amendments	AMEND Policy 16 to ensure that the 'head room' that will be needed to develop Māori land be funded and or offset by central government.
3.11.4.5 Sub-catchment scale planning	PC1-5153	Oppose the provision with amendments	AMEND Rule 3.11.4.5 to provide more detailed water testing to be done in the sub-catchments before some of the rules come into place.
Schedule B - Nitrogen Reference Point	PC1-5146	Oppose the provision with amendments	AMEND Schedule B to cover nitrogen by an input output system with pasture and cropping and the use of best practice. AND AMEND to use a system called NCheck, which is used in Canterbury. REMOVE section (g)(i) of Schedule B.
Schedule 1 - Requirements for Farm Environment Plans	PC1-5145	Support the provision with amendments	AMEND part 2(f)(ii)(d) of Schedule 1 to be more open to allow discretion for different land slopes and soil types. The setbacks could easily be agreed to with your farm planner with the assistance of soil maps. AND AMEND to provide for a 0.6m cultivation setback on flat peat land.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-5149	Oppose the provision with amendments	AMEND Table 3.11-1 to provide for meeting the water body target 80 percent of the time (or thereabouts).

## Stokes, Barbara Mary

Submitter ID: 73805

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-2439	Oppose the provision	WITHDRAW PPC1 until the Waikato Regional Council can treat all its catchment as one.
Policy 6: Restricting land use change	PC1-2434	Oppose the provision	DELETE Policy 6 in its entirety. It would be more appropriate to gauge land capability based on accurate information. AND any relevant points within the plan.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-2442	Oppose the provision	AMEND Rule 3.11.5.3 by REMOVING all current references to grandparenting and extensive operations needed for recording as the amount of nitrogen loss for grazing farms is low. AND AMEND by introducing a standard for all types of farms instead of trying to limit by type.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-2449	Oppose the provision	AMEND Rule 3.11.5.4 by REMOVING all current references to grandparenting and extensive operations needed for recording as the amount of nitrogen loss for grazing farms is low. AND AMEND by introducing a standard for all types of farms instead of trying to limit by type.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-2445	Oppose the provision	AMEND Rule 3.11.5.5 by REMOVING all current references to grandparenting and extensive operations needed for recording as the amount of nitrogen loss for grazing farms is low. AND AMEND by introducing a standard for all types of farms instead of trying to limit by type.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-2448	Oppose the provision	AMEND Rule 3.11.5.6 by REMOVING all current references to grandparenting and extensive operations needed for recording as the amount of nitrogen loss for grazing farms is low. AND AMEND by introducing a standard for all types of farms instead of trying to limit by type.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-2444	Oppose the provision	DELETE 3.11.5.7 in its entirety. It would be more appropriate to gauge land capability based on accurate information. AND any relevant points within the plan.
Schedule B - Nitrogen Reference Point	PC1-2451	Oppose the provision	AMEND Schedule B by REMOVING all current references to grandparenting and extensive operations needed for recording as the amount of nitrogen loss for grazing farms is low. AND AMEND by introducing a standard for all types of farms instead of trying to limit by type.

## Stokes, Charles Richard

Submitter ID: 74164

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-11235	Not stated	No specific decision sought for PPC1.

## Stokes, Evan

Submitter ID: 73365

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-2330	Support the provision	Not stated for PPC1.
3.11.4.4 Lakes and Whangamarino Wetland	PC1-2317	Support the provision with amendments	AMEND Method 3.11.4.4 to make provision for the complete eradication of Koi Carp.
Schedule C - Stock exclusion	PC1-2323	Support the provision with amendments	AMEND Schedule C so that the impacts on water bodies of horses being ridden or led, and feral animals, are also managed.

## Stokes, Kelvin Arnold

Submitter ID: 73748

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-5244	Support the provision	MAKE any consequential amendments to including Objectives, Policies, or other rules, or restructuring of PPC1, to give effect to the relief sought.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-5246	Oppose the provision	With respect to Objective 1, AMEND to provide a detailed model of the affect of PPC1 aspirations on all citizens, activities and businesses AND AMEND so that all citizens are aware they have a part to play, not just a few selected farmers AND AMEND so that towns and cities are all brought to account in the same timeframe. AND DELETE the Nitrogen Reference Point AND REPLACE with an effects based system that encourages farmers to address actual farm problems e.g. sediment runoff.
Objective 3: 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	PC1-5247	Oppose the provision	With respect to Objective 3, AMEND to provide a detailed model of the affect of PPC1 aspirations on all citizens and the impacts on their activities and businesses AND AMEND so that all citizens are aware they have a part to play AND AMEND so that towns and cities all brought to account in the same timeframe.
Objective 4: People and community resilience	PC1-5256	Oppose the provision with amendments	DELETE PPC1's Nitrogen Reference Point AND REPLACE with an effects based system that encourages farmers to address actual farm problems e.g. sediment runoff.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12923	Oppose the provision with amendments	Policy 2 - AMEND time frames for Farm Environment Plans to take into account the overall cost.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-5255	Oppose the provision with amendments	With respect to Policy 2, DELETE the Nitrogen Reference Point AND REPLACE with an effects based system that encourages farmers to address actual farm problems e.g. sediment runoff.
Policy 5: Staged approach	PC1-5248	Oppose the provision	With respect to Policy 5, provide a detailed model of the affect of PPC1 aspirations on all citizens and the impacts on their activities and businesses AND AMEND so that all citizens are aware they have a part to play AND AMEND so that towns and cities all brought to account in the same timeframe.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 6: Restricting land use change	PC1-5268	Oppose the provision	AMEND PPC1 so rules affect all landowners not just those in Priority 1 to Priority 3.
Policy 7: Preparing for allocation in the future	PC1-5249	Oppose the provision	With respect to Policy 7, provide a detailed model of the affect of PPC1 aspirations on all citizens and the impacts on their activities and businesses AND AMEND so that all citizens are aware they have a part to play AND AMEND so that towns and cities all brought to account in the same timeframe. With respect to Policy 7, DELETE Schedule B/Nitrogen Reference Point AND REPLACE with an effects based system that encourages farmers to address actual farm problems e.g. sediment runoff.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-4843	Oppose the provision	AMEND Rule 3.11.5.1 so stock are be excluded from all drains, streams and rivers greater than 1 metre wide that flow continually, with a fencing 500mm from the edge of the bank. AND AMEND so that any waterway fencing is subsidised by the Waikato Regional Council. AND AMEND to extend the timelines to give certainty that the rules will not be changed in the near future, so previous fencing will not be a waste of money (no further land use changes to be implemented within a 30 to 40 year period).
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-5242	Oppose the provision	AMEND Rule 3.11.5.2 so stock are be excluded from all drains, streams and rivers greater than 1 metre wide that flow continually, with a fencing 500mm from the edge of the bank. AND AMEND so that any waterway fencing is subsidised by the Waikato Regional Council. AND AMEND to extend the timelines to give certainty that the rules will not be changed in the near future, so previous fencing will not be a waste of money (no further land use changes to be implemented within a 30 to 40 year period).
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-5250	Oppose the provision with amendments	Rule 3.11.5.3: AMEND PPC1 to provide a detailed model of the affect of aspirations on all citizens and the impacts on their activities and businesses AND AMEND so that all citizens are aware they have a part to play AND AMEND so that towns and cities all brought to account in the same timeframe AND DELETE the Nitrogen Reference Point AND REPLACE with an effects based system that encourages farmers to address actual farm problems e.g. sediment runoff AND AMEND time frames for Farm Environment Plans to take into account the overall cost
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-5251	Oppose the provision with amendments	Rule 3.11.5.4: AMEND PPC1 to provide a detailed model of the affect of aspirations on all citizens and the impacts on their activities and businesses.. AND AMEND so that all citizens are aware they have a part to play. AND AMEND so that towns and cities all brought to account in the same timeframe. AND DELETE the Nitrogen Reference Point AND REPLACE with an effects based system that encourages farmers to address actual farm problems e.g. sediment runoff AND AMEND time frames for Farm Environment Plans to take into account the overall cost.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-5253	Oppose the provision with amendments	Rule 3.11.5.5: AMEND PPC1 to provide a detailed model of the affect of aspirations on all citizens and the impacts on their activities and businesses. AND AMEND so that all citizens are aware they have a part to play. AND AMEND so that towns and cities all brought to account in the same timeframe. AND DELETE the Nitrogen Reference Point AND REPLACE with an effects based system that encourages farmers to address actual farm problems e.g. sediment runoff AND AMEND time frames for Farm Environment Plans to take into account the overall cost.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13099	Support the provision with amendments	Rule 3.11.5.6 - AMEND time frames for Farm Environment Plans to take into account the overall cost.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-5259	Oppose the provision with amendments	With respect to Rule 3.11.5.6, DELETE the Nitrogen Reference Point AND REPLACE with an effects based system that encourages farmers to address actual farm problems e.g. sediment runoff.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-5264	Oppose the provision with amendments	DELETE Rule 3.11.5.7 AND DELETE the PPC1 Nitrogen Reference Point AND REPLACE with an effects based system that encourages farmers to address actual farm problems e.g. sediment runoff AND AMEND time frames for Farm Environment Plans to take into account the overall cost AND AMEND PPC1 to ensure rules affect all land owners, not just those in Priority 1 and Priority 3 areas.
Schedule B - Nitrogen Reference Point	PC1-5258	Oppose the provision with amendments	DELETE the Nitrogen Reference Point AND REPLACE with an effects based system that encourages farmers to address actual farm problems e.g. sediment runoff. (Schedule B)
Schedule C - Stock exclusion	PC1-5243	Oppose the provision	AMEND Schedule C so stock are be excluded from all drains, streams and rivers greater than 1 metre wide that flow continually, with a fencing 500mm from the edge of the bank. AND AMEND so that any waterway fencing is subsidised by the Waikato Regional Council. AND AMEND to extend the timelines to give certainty that the rules will not be changed in the near future, so previous fencing will not be a waste of money (no further land use changes to be implemented within a 30 to 40 year period).
Schedule 1 - Requirements for Farm Environment Plans	PC1-5265	Support the provision with amendments	AMEND Schedule 1 time frames for Farm Environment Plans to take into account the overall cost.

## Stokes, Olive Fay

Submitter ID: 71402

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-12308	Oppose the provision	No specific decision sought for PPC1.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-12301	Oppose the provision	No specific decision sought for Rule 3.11.5.2.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-12302	Oppose the provision with amendments	AMEND Rule 3.11.5.3 as requested by Federated Farmers in their submission [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is: 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.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND DELETE Rule 3.11.5.2 (4) (c).            AND ADD a NEW permitted activity rule to read:  <u>“The use of land for farming activities (excluding commercial vegetable production) where the property area is greater than 4.1 hectares is a Permitted Activity provided that:</u>  <u>1) The change in the use of land is not from non-milking dairy farming to milking dairy farming; or</u>  <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>  <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>            AND AMEND PPC1 so that normal farming activities in rural areas are permitted activities.            AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities.]</p>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-12303	Oppose the provision with amendments	<p>AMEND Rule 3.11.5.4 as requested by Federated Farmers in their submission            [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is:            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:  <u>“The use of land for farming activities (excluding commercial vegetable production) where the property area is greater than 4.1 hectares is a Permitted Activity provided that:</u>  <u>1) The change in the use of land is not from non-milking dairy farming to milking dairy farming; or</u>  <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>  <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>            AND AMEND PPC1 so that normal farming activities in rural areas are permitted activities.            AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities.]</p>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-12304	Oppose the provision with amendments	<p>AMEND Rule 3.11.5.7 as requested by Federated Farmers in their submission            [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>
Schedule B - Nitrogen Reference Point	PC1-12305	Oppose the provision with amendments	<p>AMEND Schedule B as requested by Federated Farmers in their submission            [AMEND Schedule B 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 B</p>



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			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 B match the Policies, Methods, definitions, etc. to which Schedule B relates.]
Schedule C - Stock exclusion	PC1-12306	Oppose the provision with amendments	AMEND Schedule C to include all animals, including horses and all feral animals.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12307	Oppose the provision with amendments	AMEND Schedule 1 as requested by Federated Farmers in their submission [AMEND Schedule 1 to ensure that the purpose for which information is being sought is clearly stated AND ENSURE that 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.]

## Stokes, Tim

Submitter ID: 74167

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-7781	Oppose the provision with amendments	No specific decision sought for Rule 3.11.5.2.
Schedule B - Nitrogen Reference Point	PC1-7775	Oppose the provision with amendments	AMEND Schedule B so that stocking is determined through individual plans, which are approved based on the merits of each individual proposal for each property.

# Stokes Shorthorn Farm Ltd

Submitter ID: 73804

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-4048	Oppose the provision	AMEND Objective 1 by providing a detailed model that clearly sets out the time frame between 0-80 years. AND AMEND by allowing the model to give expected outcomes as a result of the implementations made by the Council. AND AMEND Objective 1 by setting aside the Nitrogen Reference Point and provide a system which is effects based. AND AMEND Objective 1 by addressing actual farming problems rather than a blanket approach.
Objective 3: 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	PC1-4049	Oppose the provision with amendments	AMEND Objective 3 by providing a detailed model that clearly sets out the time frame between 0-80 years. AND AMEND by allowing the model to give expected outcomes as a result of the implementations made by the Council.
Objective 4: People and community resilience	PC1-4057	Oppose the provision with amendments	AMEND Objective 4 by setting aside the Nitrogen Reference Point and a system where effects based is utilised. AND AMEND Objective 4 by addressing actual farming problems rather than a blanket approach.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-4058	Support the provision with amendments	AMEND Policy 2 by setting aside the Nitrogen Reference Point and provide a system which is effects based.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12925	Support the provision with amendments	AMEND Policy 2 by addressing actual farming problems rather than a blanket approach.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12924	Support the provision with amendments	AMEND Policy 2 to allow farmers to prepare Farm Environment Plans themselves under certain guidelines and are flexible to meet the changing rules that Council is likely to introduce in future years.
Policy 5: Staged approach	PC1-4050	Oppose the provision with amendments	AMEND Policy 5 by providing a detailed model that clearly sets out the time frame between 0-80 years. AND AMEND by allowing the model to give expected outcomes as a result of the implementations made by the Council.
Policy 6: Restricting land use change	PC1-4136	Support the provision with amendments	AMEND Policy 6 by gradually introducing the rule and it should not be a rule that only selected people are affected by.
Policy 7: Preparing for allocation in the future	PC1-4051	Oppose the provision with amendments	AMEND Policy 7 by providing a detailed model that clearly sets out the time frame between 0-80 years. AND AMEND by allowing the model to give expected outcomes as a result of the implementations made by the Council.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AMEND Policy 7 by setting aside the Nitrogen Reference Point and provide a system which is effects based.</p> <p>AND AMEND Policy 7 by addressing actual farming problems rather than a blanket approach.</p>
<p>Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land</p>	<p>PC1-4141</p>	<p>Oppose the provision</p>	<p>DELETE Policy 16.</p>
<p>3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities</p>	<p>PC1-4045</p>	<p>Oppose the provision</p>	<p>AMEND Rule 3.11.5.1 to ensure stock is excluded from all drains/streams greater than 1 metre wide that run continually with a fence 500mm from the edge of a bank.</p> <p>AND AMEND by extending the timelines and give certainty to those of us with land classed as at risk of erosion.</p> <p>AND AMEND by providing a fencing subsidy and compensation where exclusion impacts on the farms income.</p>
<p>3.11.5.2 Permitted Activity Rule – Other farming activities</p>	<p>PC1-4047</p>	<p>Oppose the provision with amendments</p>	<p>AMEND Rule 3.11.5.2 to ensure stock is excluded from all drains/streams greater than 1 metre wide that run continually with a fence 500mm from the edge of a bank.</p> <p>AND AMEND by extending the timelines and give certainty to those of us with land classed as at risk of erosion.</p> <p>AND AMEND by providing a fencing subsidy and compensation where exclusion impacts on the farms income.</p>
<p>3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme</p>	<p>PC1-4052</p>	<p>Oppose the provision with amendments</p>	<p>AMEND Rule 3.11.5.3 by providing a detailed model that clearly sets out the time frame between 0-80 years.</p> <p>AND AMEND by allowing the model to give expected outcomes as a result of the implementations made by the Council.</p> <p>AMEND Rule 3.11.5.3 by setting aside the Nitrogen Reference Point and provide a system which is effects based.</p> <p>AND AMEND Rule 3.11.5.3 by addressing actual farming problems rather than a blanket approach.</p> <p>AMEND Rule 3.11.5.3 by allowing farmers to prepare Farm Environment Plans themselves under certain guidelines and are flexible to meet the changing rules that Council is likely to introduce in future years.</p>
<p>3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme</p>	<p>PC1-4053</p>	<p>Oppose the provision with amendments</p>	<p>AMEND Rule 3.11.5.4 by providing a detailed model that clearly sets out the time frame between 0-80 years.</p> <p>AND AMEND by allowing the model to give expected outcomes as a result of the implementations made by the Council.</p> <p>AMEND Rule 3.11.5.4 by setting aside the Nitrogen Reference Point and provide a system which is effects based.</p> <p>AND AMEND Rule 3.11.5.4 by addressing actual farming problems rather than a blanket approach.</p> <p>AMEND Rule 3.11.5.4 by allowing farmers to prepare Farm Environment Plans themselves under certain guidelines and are flexible to meet the changing rules that Council is likely to introduce in future years.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-4054	Support the provision with amendments	AMEND Rule 3.11.5.5 by providing a detailed model that clearly sets out the time frame between 0-80 years. AND AMEND by allowing the model to give expected outcomes as a result of the implementations made by the Council. AMEND Rule 3.11.5.5 by setting aside the Nitrogen Reference Point and provide a system which is effects based. AND AMEND Rule 3.11.5.5 by addressing actual farming problems rather than a blanket approach. AMEND Rule 3.11.5.5 by allowing farmers to prepare Farm Environment Plans themselves under certain guidelines and are flexible to meet the changing rules that Council is likely to introduce in future years.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-4060	Support the provision with amendments	AMEND Rule 3.11.5.6 by setting aside the Nitrogen Reference Point and provide a system which is effects based AND AMEND Rule 3.11.5.6 by addressing actual farming problems rather than a blanket approach.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13100	Support the provision with amendments	AMEND Rule 3.11.5.6 by allowing farmers to prepare Farm Environment Plans themselves under certain guidelines and are flexible to meet the changing rules that Council is likely to introduce in future years.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-4061	Support the provision with amendments	AMEND Rule 3.11.5.7 by setting aside the Nitrogen Reference Point and provide a system which is effects based. AND AMEND Rule 3.11.5.7 by addressing actual farming problems rather than a blanket approach. AMEND Rule 3.11.5.7 by allowing farmers to prepare Farm Environment Plans themselves under certain guidelines and are flexible to meet the changing rules that Council is likely to introduce in future years. AMEND Rule 3.11.5.7 by gradually introducing the rule and it should not be a rule that only selected people are affected by.
Schedule C - Stock exclusion	PC1-4043	Oppose the provision	AMEND Schedule C where stock is excluded from all drains/streams greater than 1 metre wide that run continually with a fence 500mm from the edge of a bank. AND AMEND by extending the timelines and give certainty to those of us with land classed as at risk of erosion, so that we are not wasting our money and resources in fencing it due the possibility it may be changed. AND AMEND by providing a fencing subsidy and compensation where exclusion impacts on the farms income.
Schedule 1 - Requirements for Farm Environment Plans	PC1-4062	Support the provision with amendments	AMEND Schedule 1 by setting aside the Nitrogen Reference Point and provide a system which is effects based.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12528	Support the provision with amendments	AMEND Schedule 1 by addressing actual farming problems rather than a blanket approach.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12527	Support the provision with amendments	AMEND Schedule 1 by allowing farmers to prepare Farm Environment Plans themselves under certain guidelines and are flexible to meet the changing rules that Council is likely to introduce in future years.

## Stokman, Mark and Sharon

Submitter ID: 73976

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-11292	Not stated	WITHDRAW PPC1 until the Waikato Regional Council can treat the whole of its catchment as one.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-6685	Oppose the provision	WITHDRAW PPC1 and replace with objectives and numerical water quality limits/targets that consider the reality of the Waikato, are achievable, provide for the protection of its life supporting capacity, and also ensure that the health and well-being, including social and economic values of people and communities, are safeguarded.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-6690	Support the provision with amendments	AMEND Policy 4 so that small scale, low intensity and low risk land uses, including forestry, are enabled to continue, be flexible and be established. AND DELETE the reference to further reductions in contaminants from low intensity and low risk land use.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-6688	Support the provision with amendments	AMEND Rule 3.11.5.1 to be consistent with Policy 4 and enable small and low intensity and low risk farming activities to continue if existing, be established and be flexible AND AMEND to merge Rule 3.11.5.1 and 3.11.5.2 into one rule AND AMEND to include as a Permitted Activity land uses with stocking rates at or below 18 stock units and enable the stocking rate to increase from current up to this standard OR AMEND to relate stocking rates to soil and geology, ie 20 stock units for Land Use Capability classes 1, 2 and 3; 18 stock units for Land Use Capability class 4; and 16 stock units for Land Use Capability class 6 or 7 OR AMEND to set nitrogen loading limits such as 25kg/N/ha/yr for Land Use Capability class 1; 20kg/N/ha/yr for Land Use Capability class 2; 18kg/N/ha/yr for Land Use Capability class 3; 16kg/N/ha/yr for Land Use Capability class 4; 12kg/N/ha/yr for Land Use Capability class 5; 10kg/N/ha/yr for Land Use Capability class 6; and 8kg/N/ha/yr for Land Use Capability class 7 (or viable alternatives) AND DELETE the 6 stock unit standard AND DELETE the 4.1 hectares limit and provide for up to 20 hectares AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards AND DELETE any standards or clauses which hold land uses to historic discharges levels or stocking rates AND AMEND PPC1 to apply national stock exclusion requirements which relate to exclusion of cattle, deer and pigs from 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 AND AMEND riparian setback distances so they only apply to flat and rolling land and not hill country (ie slope <= 15 degrees) AND DELETE the requirements in Rule 3.11.5.1 relating to excluding cattle from waterbodies through permanent fencing

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND Rule 3.11.5.1, where there is a scientifically proven water quality issue related to stock access to waterbodies, so the requirement to exclude cattle through permanent fencing is tailored on a farm by farm, district by district and sub-catchment basis, ensuring flexibility to provide for alternative management arrangements for certain land uses and terrains to achieve the same outcome</p> <p>AND AMEND PPC1 so that Farm Environment Plans focus on addressing actual risk, targeting critical source areas rather than applying blanket stock exclusion through permanent fencing</p> <p>AND AMEND PPC1 to include the ability to muster cattle through a water body without requiring a formed stock crossing when crossing less than three times per week.</p>
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-6689	Support the provision with amendments	<p>AMEND Rule 3.11.5.2 to be consistent with Policy 4 and enable small and low intensity and low risk farming activities to continue if existing, be established and be flexible</p> <p>AND AMEND to merge Rule 3.11.5.1 and 3.11.5.2 into one rule</p> <p>AND AMEND to include as a Permitted Activity land uses with stocking rates at or below 18 stock units and enable the stocking rate to increase from current up to this standard</p> <p>OR AMEND to relate stocking rates to soil and geology, ie 20 stock units for Land Use Capability classes 1, 2 and 3; 18 stock units for Land Use Capability class 4; and 16 stock units for Land Use Capability class 6 or 7</p> <p>OR AMEND to set nitrogen loading limits such as 25kg/N/ha/yr for Land Use Capability class 1; 20kg/N/ha/yr for Land Use Capability class 2; 18kg/N/ha/yr for Land Use Capability class 3; 16kg/N/ha/yr for Land Use Capability class 4; 12kg/N/ha/yr for Land Use Capability class 5; 10kg/N/ha/yr for Land Use Capability class 6; and 8kg/N/ha/yr for Land Use Capability class 7 (or viable alternatives)</p> <p>AND DELETE the 6 stock unit standard</p> <p>AND DELETE the 4.1 hectares limit and provide for up to 20 hectares</p> <p>AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards</p> <p>AND DELETE any standards or clauses which hold land uses to historic discharges levels or stocking rates</p> <p>AND AMEND PPC1 to apply national stock exclusion requirements which relate to exclusion of cattle, deer and pigs from 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 DELETE clause 4(c) of Rule 3.11.5.2.</p> <p>AND AMEND riparian setback distances so they only apply to flat and rolling land and not hill country (ie slope &lt;= 15 degrees)</p> <p>AND DELETE the requirements in Rule 3.11.5.2 relating to excluding cattle from waterbodies through permanent fencing</p> <p>AND AMEND Rule 3.11.5.2, where there is a scientifically proven water quality issue related to stock access to waterbodies, so the requirement to exclude cattle through permanent fencing is tailored on a farm by farm, district by district and sub-catchment basis, ensuring flexibility to provide for alternative management arrangements for certain land uses and terrains to achieve the same outcome</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND PPC1 so that Farm Environment Plans focus on addressing actual risk, targeting critical source areas rather than applying blanket stock exclusion through permanent fencing AND AMEND PPC1 to include the ability to muster cattle through a water body without requiring a formed stock crossing when crossing less than three times per week.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-6699	Oppose the provision	DELETE the requirements in Rule 3.11.5.3 relating to excluding cattle from waterbodies through permanent fencing AND AMEND Rule 3.11.5.3, where there is a scientifically proven water quality issue related to stock access to waterbodies, so the requirement to exclude cattle through permanent fencing be tailored on a farm by farm, district by district and sub-catchment basis, so there is flexibility to provide for alternative management arrangements to achieve the same outcome in relation to certain land uses and terrains AND AMEND PPC1 so that Farm Environment Plans focus on addressing actual risk targeting critical source areas rather than applying blanket stock exclusion through permanent fencing AND AMEND PPC1 to include the ability to muster cattle through a water body without requiring a formed stock crossing when crossing less than three times per week AND REMOVE the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point AND AMEND to ensure where the OVERSEER Model is used that Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters AND AMEND to use the Olsen P from soil tests as a possible marker for nutrient losses AND AMEND PPC1 so Farm Environment Plans are only required in sub-catchments where science shows improvements are required AND AMEND the Farm Environment Plan rules to allow flexibility, such as with nitrogen discharges and application of good management practices, and are tailored to the individual property and focus on critical source management rather than applying blanket regulatory standards AND AMEND PPC1 so an independent panel is convened to allow contested points between staff and farmers in Farm Environment Plans to be addressed without the need to appeal to the Environment Court.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-6700	Oppose the provision	DELETE the requirements in Rule 3.11.5.4 relating to excluding cattle from waterbodies through permanent fencing. AND AMEND Rule 3.11.5.4 so, where there is a scientifically proven water quality issue related to stock access to waterbodies, the requirement to exclude cattle through permanent fencing be tailored on a farm by farm, district by district and sub-catchment basis, so there is flexibility for alternative management approaches to achieve the same outcome in relation to certain land uses and terrains AND REPLACE the 25 degree slope provision in Rule 3.11.5.4 with farming intensity over 18 sock units per hectare. AND AMEND PPC1 so that Farm Environment Plans focus on addressing actual risk, targeting critical source areas rather than applying blanket stock exclusion through permanent fencing

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND PPC1 to include the ability to muster cattle through a water body without requiring a formed stock crossing when crossing less than three times per week</p> <p>AND REMOVE the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point</p> <p>AND AMEND to ensure where the OVERSEER Model is used that Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters</p> <p>AND AMEND to use the Olsen P from soil tests as a possible marker for nutrient losses</p> <p>AND AMEND PPC1 so Farm Environment Plans are only required in sub-catchments where science shows improvements are required</p> <p>AND AMEND the Farm Environment Plan rules to allow flexibility, such as with nitrogen discharges and application of good management practices, and are tailored to the individual property and focus on critical source management rather than applying blanket regulatory standards</p> <p>AND AMEND PPC1 so an independent panel is convened to allow contested points between staff and farmers in Farm Environment Plans to be addressed without the need to appeal to the Environment Court.</p>
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-6701	Oppose the provision	<p>REMOVE from Rule 3.11.5.5 the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point</p> <p>AND AMEND to ensure where the OVERSEER Model is used that Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters</p> <p>AND AMEND to use the Olsen P from soil tests as a possible marker for nutrient losses.</p>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13101	Oppose the provision	<p>AMEND Rule 3.11.5.6 to allow for flexibility by establishing provisions which manage effects and are based on the underlying soil properties and their productive potential</p> <p>AND AMEND Rule 3.11.5.6 to provide exceptions to land use change exceptions, including for smaller land areas (below 40 hectares) and where environmental effects are minimal or advantageous.</p>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13102	Oppose the provision	<p>AMEND PPC1 so the restrictions and assessment of effects is not limited to the consideration of nitrogen discharges as modelled by the OVERSEER Model.</p> <p>AND DELETE the Nitrogen Reference Point provisions.</p> <p>AND AMEND to ensure the application of the rules is low cost and with limited bureaucracy.</p> <p>AND REMOVE the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point</p> <p>AND AMEND to ensure where the Overseer Model is used that Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters</p> <p>AND AMEND to use the Olsen P from soil tests as a possible marker for nutrient losses.</p>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13103	Oppose the provision	<p>AMEND PPC1 so Farm Environment Plans are only required in sub-catchments where science shows improvements are required</p>



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND the Farm Environment Plan rules to allow flexibility, such as with nitrogen discharges and application of good management practices, and are tailored to the individual property and focus on critical source management rather than applying blanket regulatory standards AND AMEND PPC1 so an independent panel is convened to allow contested points between staff and farmers in Farm Environment Plans to be addressed without the need to appeal to the Environment Court.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-6702	Oppose the provision	DELETE the requirements in Rule 3.11.5.6 relating to excluding cattle from waterbodies through permanent fencing AND AMEND Rule 3.11.5.6 so, where there is a scientifically proven water quality issue related to stock access to waterbodies, the requirement to exclude cattle through permanent fencing be tailored on a farm by farm, district by district and sub-catchment basis, so there is flexibility to provide for alternative management arrangements to achieve the same outcome in relation to certain land uses and terrains AND AMEND PPC1 so that Farm Environment Plans focus on addressing actual risk, targeting critical source areas rather than applying blanket stock exclusion through permanent fencing AND AMEND PPC1 to include the ability to muster cattle through a water body without requiring a formed stock crossing when crossing less than three times per week.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-6693	Oppose the provision	AMEND Rule 3.11.5.7 to allow for flexibility by establishing provisions which manage effects and are based on the underlying soil properties and their productive potential AND AMEND Rule 3.11.5.7 to provide exceptions to land use change exceptions, including for smaller land areas (below 40 hectares) and where environmental effects are minimal or advantageous AND AMEND PPC1 so the restrictions and assessment of effects is not limited to the consideration of nitrogen discharges as modelled by the OVERSEER Model AND DELETE the Nitrogen Reference Point provisions AND AMEND to ensure the application of the rules is low cost and with limited bureaucracy AND REMOVE the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point AND AMEND to ensure where the OVERSEER Model is used that Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters AND AMEND to use the Olsen P from soil tests as a possible marker for nutrient losses.
Schedule B - Nitrogen Reference Point	PC1-6694	Oppose the provision	REMOVE the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point AND AMEND Schedule B to use actual weights and therefore accurate stock measurements AND AMEND to ensure where the OVERSEER Model is used that Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters AND AMEND to use the Olsen P from soil tests as a possible marker for nutrient losses.
Schedule C - Stock exclusion	PC1-6697	Support the provision with amendments	DELETE the requirements in Schedule C relating to excluding cattle from waterbodies through permanent fencing

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND Schedule C so, where there is a scientifically proven water quality issue related to stock access to waterbodies, the requirement to exclude cattle through permanent fencing be tailored on a farm by farm, district by district and sub-catchment basis, so there is flexibility to provide for alternative management arrangements to achieve the same outcome in relation to certain land uses and terrains</p> <p>AND AMEND PPC1 so that Farm Environment Plans focus on addressing actual risk, targeting critical source areas rather than applying blanket stock exclusion through permanent fencing</p> <p>AND AMEND PPC1 to include the ability to muster cattle through a water body without requiring a formed stock crossing when crossing less than three times per week.</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-6695	Oppose the provision	<p>AMEND PPC1 so Farm Environment Plans are only required in sub-catchments where science shows improvements are required</p> <p>AND AMEND the Farm Environment Plan rules to allow flexibility, such as with nitrogen discharges and application of good management practices, and are tailored to the individual property and focus on critical source management rather than applying blanket regulatory standards</p> <p>AND AMEND PPC1 so an independent panel is convened to allow contested points between staff and farmers in Farm Environment Plans to be addressed without the need to appeal to the Environment Court.</p>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-6692	Oppose the provision	<p>WITHDRAW PPC1 and replace with objectives and numerical water quality limits/targets that consider the reality of the Waikato, are achievable, provide for the protection of its life supporting capacity, and also ensure that the health and well-being, including social and economic values of people and communities, are safeguarded.</p>
Definition - Stock unit	PC1-6696	Oppose the provision	<p>AMEND Definition - Stock unit to use actual weights and therefore accurate stock measurements, rather than standardised input parameters.</p>

## Storey, Campbell Grant

Submitter ID: 73281

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6506	Oppose the provision	<p>AMEND to extend the 10 year tenure of PPC1</p> <p>AND AMEND PPC1 to provide certainty around what further changes are planned and what their impacts will be.</p>
Schedule B - Nitrogen Reference Point	PC1-6504	Oppose the provision	<p>AMEND Schedule B so everyone has the same nitrogen limit and is contributing equally to the changes required to improve waterways. For example, if the limit is X, then those below X can increase and those above can decrease.</p> <p>AND investigate how nutrient losses from cut and carry dairy goat farming systems can be calculated.</p>

## Stoupe, David

Submitter ID: 71611

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-1582	Oppose the provision	AMEND Rule 3.11.5.7 to provide consistency.

## Strang and Strang Limited

Submitter ID: 73851

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-5563	Support the provision with amendments	AMEND to replace the PPC1 approach with clear, effective, Best Management Practice rules that apply to everyone fairly and equally AND AMEND to ensure a future allocation regime treats like land alike and is based on a consistent foundation such as Land Use Capability AND REMOVE grandparenting approach AND REMOVE the freeze on land use change AND AMEND so the OVERSEER Model is not used as the tool for allocation of leaching rights.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12926	Oppose the provision with amendments	DELETE Policy 2 (c).
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12927	Support the provision	RETAIN Policy 2 (d).
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-5564	Oppose the provision with amendments	REPLACE or supplement the tailored approach in Policy 2 with sound sensible Best Management Practices for all land use activities to be adopted within workable but prompt timeframes.
Policy 6: Restricting land use change	PC1-5566	Oppose the provision	DELETE Policy 6.
Policy 7: Preparing for allocation in the future	PC1-5567	Support the provision	RETAIN Policy 7 AND AMEND to include a clearer transition toward a non-grandparented approach to allocation within the life of PPC1.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-5568	Support the provision	RETAIN Rule 3.11.5.1 OR amalgamate with Rule 3.11.5.2.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-5569	Support the provision with amendments	RETAIN Rule 3.11.5.2 but include region wide Best Management Practice based rules to be followed on all rural properties, including those under 20 hectares.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm	PC1-5570	Oppose the provision with amendments	REPLACE Rule 3.11.5.3 with a Best Management Practice approach with permitted activity conditions above which a consent would be required.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Environment Plan under a Certified Industry Scheme			
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-5571	Oppose the provision with amendments	AMEND the rules so that farming activities are permitted subject to application of proven practical Best Management Practices that are known to improve water quality. AND AMEND to incorporate the minimum standards in the Farm Environment Plan into the rules, including the information requirements contained in the Farm Environment Plan. AND REMOVE the reliance on Nitrogen Reference Points and the OVERSEER Model as a method for assessing compliance.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-5572	Oppose the provision with amendments	REPLACE Rule 3.11.5.5 with a Best Management Practice approach.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-5573	Oppose the provision with amendments	AMEND Rule 3.11.5.6 matters for control as appropriate to ensure that a Best Management Practice approach is applied to applicants for resource consent.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-5574	Oppose the provision	DELETE Rule 3.11.5.7 AND REPLACE with a robust Best Management Practice approach that applies fairly to all farmers, regardless of their current land use practices.
Schedule B - Nitrogen Reference Point	PC1-5575	Oppose the provision	DELETE Schedule B. AND DELETE in PPC1 any reference to Nitrogen Reference Points. OR AMEND PPC1 so Nitrogen Reference Points are used as an information gathering tool only.
Schedule C - Stock exclusion	PC1-5576	Support the provision with amendments	AMEND and simplify the rules to require fencing of stock in a short timeframe for easy country but develop practical time frames and in some instances potentially exemptions for steep extensive hill country.
Schedule 1 - Requirements for Farm Environment Plans	PC1-5577	Oppose the provision	REPLACE reliance on Farm Environment Plans in PPC1 with a Best Management Practice approach, to be implemented immediately. IF Farm Environment Plans are not replaced then AMEND Schedule 1 to include specific and straight forward actions that are known to be viable and reduce contaminant loss.
Schedule 2 - Certification of Industry Schemes	PC1-5578	Oppose the provision	DELETE Schedule 2.
Definition - Arable cropping	PC1-5579	Not stated	REMOVE from the definition of arable cropping the arbitrary delineation between different forms of cropping that in reality have very similar effects.
Definition - Commercial vegetable production	PC1-5580	Not stated	REMOVE from the definition of Commercial Vegetable Production the arbitrary delineation between different forms of cropping that in reality have very similar effects.

## Strawbridge, Craig Wayne

Submitter ID: 73503

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8663	Oppose the provision	AMEND PPC1 to spread the cost over rural and urban communities. AND AMEND PPC1 based on a sub-catchment approach.
Schedule B - Nitrogen Reference Point	PC1-8661	Oppose the provision	AMEND Schedule B to manage nutrients with a sub-catchment approach AND AMEND to relate the Nitrogen Reference Point to high nitrogen users, not low users.

## Strawbridge, David N

Submitter ID: 73951

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-3495	Oppose the provision	No specific decision sought for Schedule B.
Schedule C - Stock exclusion	PC1-4675	Oppose the provision	No specific decision sought Schedule C.

## Stubbs and Brown, Ben and Rebecca

Submitter ID: 73924

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-5014	Oppose the provision	AMEND Policy 2(c) to require identified higher emitters to reduce their Nitrogen Reference Point and allow low emitters some room to move, rather than have their Nitrogen Reference Point capped AND AMEND to ensure low emitters are not locked into a financially crippling process AND AMEND to ensure a fair system is developed for low nitrogen emitters to have room to move.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12928	Oppose the provision	AMEND Policy 2(e) to provide for stock exclusion and water reticulation in a staged/targeted manner by identifying key areas to be prioritised.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12929	Oppose the provision	AMEND Policy 2 to provide a Farm Environment Plan with milestones. Council to check compliance without additional expense to the farmers, unless non-compliant.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12930	Oppose the provision	AMEND Policy 2 to use a sub-catchment group approach to solve shared challenges facing farmers AND AMEND to move cropping to a consented practice, like forestry.
3.11.4.3 Farm Environment Plans	PC1-5015	Oppose the provision	AMEND Method 3.11.4.3 to provide a Farm Environment Plan with milestones. Council to check compliance without additional expense to the farmers, unless non-compliant.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-5016	Oppose the provision	AMEND Rule 3.11.5.3 to use a sub-catchment group approach to solve many shared challenges facing farmers AND AMEND to ensure a fair system is developed for low nitrogen emitters to be able to have room to move AND AMEND to move cropping to a consented practice, like forestry.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-5017	Oppose the provision	AMEND Rule 3.11.5.4 to ensure Farm Environment Plans do not lock low emitters into a financially crippling process.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-5021	Oppose the provision	AMEND Rule 3.11.5.7 to provide clarity on whether Rule 3.11.5.7 applies to stands of gorse and other woody weed species.
Schedule B - Nitrogen Reference Point	PC1-5018	Oppose the provision	No specific decision was requested for Schedule B.
Schedule C - Stock exclusion	PC1-5020	Oppose the provision	AMEND Schedule C to provide more clarity.

## Sullivan, Daniel John

Submitter ID: 72952

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-1616	Oppose the provision	No specific decision was requested for Rule 3.11.5.2.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-1618	Oppose the provision with amendments	AMEND Rule 3.11.5.3 to allow Priority 1 farms to submit a Farm Environment Plan by 2021.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-1621	Oppose the provision	AMEND Rule 3.11.5.4 to allow Priority 1 farms to submit a Farm Environment Plan by 2021.
Schedule A - Registration with Waikato Regional Council	PC1-1622	Support the provision	No specific decision was requested for Schedule A.
Schedule B - Nitrogen Reference Point	PC1-1624	Oppose the provision	AMEND Schedule B to extend the reference point calculation years to 2011/2012, 2012/2013, 2013/2014, 2014/2015 and 2015/2016.
Schedule C - Stock exclusion	PC1-1633	Oppose the provision	AMEND Schedule C as requested by Federated Farmers in their submission. [AMEND Schedule C 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 C

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<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 C match the Policies, Methods, definitions, etc. to which Schedule C relates</p> <p>AND REMOVE requirements for fencing off water bodies AND AMEND to adopt the Government's Clean Water Package 2017 stock exclusion standards as an interim measure</p> <p>AND DEVELOP more detailed proposals at a sub-catchment level later, through a freshwater management unit based assessment, and implemented then through a sub-catchment based plan change</p> <p>AND MAKE any consequential amendments to PPC1.]</p>

## Sutherland, Mark Nicholas

Submitter ID: 73417

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7475	Oppose the provision	DELETE PPC1 in its entirety.
Schedule B - Nitrogen Reference Point	PC1-7476	Oppose the provision	DELETE Schedule B in its entirety. If not deleted, then AMEND to provide for good management practices to be used as the reference point.

## Sutherland Produce Ltd

Submitter ID: 74155

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7024	Not stated	No specific decision requested for PPC1.
Area covered by Chapter 3.11	PC1-7025	Oppose the provision	WITHDRAW PPC1 in its entirety AND RE-NOTIFY PPC1 with the inclusion of the withdrawn area.
Background and explanation	PC1-7030	Oppose the provision with amendments	AMEND PPC1 to provide for commercial vegetable production on new sites in the Waikato River catchment AND AMEND to provide an alternative method or model to establish a benchmark nitrogen and phosphorus discharge for commercial vegetable production systems AND AMEND to recognise permanent fruit production as a low intensity farming activity.
Use values - Primary production	PC1-7034	Support the provision	RETAIN Use Value - Primary Production as a Mana Tangata value.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-7036	Support the provision	RETAIN Objective 2.
Objective 3: 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	PC1-7037	Support the provision with amendments	AMEND PPC1 to provide flexibility to land managers seeking to achieve reductions collaboratively at a catchment or sub-catchment scale.
Objective 4: People and community resilience	PC1-7038	Support the provision with amendments	AMEND Objective 4 to recognise that PPC1 is transitional, to provide time to develop the tools required to more efficiently allocate responsibility for achieving contaminant reduction targets in the long-term.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-7039	Support the provision	RETAIN Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12931	Support the provision with amendments	AMEND Policy 2 to provide a consenting pathway for groups to reduce contaminants through a combination of catchment and paddock-scale mitigation measures.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-7040	Support the provision with amendments	AMEND Policy 2 to provide alternatives to the OVERSEER Model.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-7044	Support the provision with amendments	RETAIN Policy 3 subject to consequential amendments to other policies and methods to give effect to the relief sought.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-7046	Support the provision	RETAIN Policy 4.
Policy 5: Staged approach	PC1-7048	Support the provision	RETAIN Policy 5.
Policy 6: Restricting land use change	PC1-7049	Oppose the provision with amendments	AMEND Policy 6 to provide a restricted discretionary activity for operations that can demonstrate clear and enduring decreases in existing diffuse discharges.
Policy 7: Preparing for allocation in the future	PC1-7055	Support the provision with amendments	AMEND Policy 7 to recognise the polluter pays concept.
Policy 8: Prioritised implementation	PC1-7058	Support the provision with amendments	RETAIN Policy 8 AND ADD an enabling policy that allows for the management of horticultural enterprises between sub-catchments.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-7061	Oppose the provision	AMEND Policy 9 to provide for offsetting where it can be demonstrated that there will be a commensurate effect on the restoration of the health and well-being of the Waikato River AND AMEND to provide a consenting pathway that enables groups to manage contaminants through a combination of catchment and paddock scale mitigations.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-7068	Support the provision with amendments	AMEND Policy 11 and method to extend to non-point source discharges.
3.11.5 Rules	PC1-7078	Support the provision	ADD to 3.11.5 Rules a NEW restricted discretionary activity to enable a catchment collective to manage contaminants.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-7077	Support the provision	RETAIN Rule 3.11.5.1.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-7079	Support the provision	RETAIN Rule 3.11.5.5.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-7082	Oppose the provision	ADD a NEW restricted discretionary activity rule for new and additional commercial vegetable production that demonstrates a decrease in the discharges of nitrogen, phosphorous, sediment or microbial pathogens as a result of the land use change.

## Sutton, John Vincent

Submitter ID: 71403

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-1258	Support the provision with amendments	RETAIN the goal to clear waterways by 2026. AND CONSIDER undertaking further discussions on the Nitrogen Reference Point [Nutrient Discharge Allowance NDA] and stock and fencing issues.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-1236	Oppose the provision	AMEND Rule 3.11.5.2 to allow a stocking rate greater than the number at 22 October 2016. AND AMEND the stock exclusion provisions so that swamp areas are not required to be fenced. AND AMEND to extend the time frame of compliance to 2026.
Schedule C - Stock exclusion	PC1-1146	Support the provision with amendments	AMEND Schedule C stock exclusion to provide for longer timeframes up to 2026. AND AMEND to exclude swamp areas from the requirement for fencing.

## Swales, Donald Horton

Submitter ID: 71252

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-267	Oppose the provision	WITHDRAW PPC1.
Schedule B - Nitrogen Reference Point	PC1-271	Oppose the provision	AMEND Schedule B to control the amount of artificial nitrogen that can be applied in any year.

## Swiss Belle Farm Ltd

Submitter ID: 73391

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6858	Oppose the provision	AMEND PPC1 to ensure a flexible and differentiated approach is taken to reward farmers who look after the environment. AND AMEND PPC1 to ensure people are all aware of their impact on water quality and are all doing their bit. AND CONSIDER in the hearing process that submitters are able to raise any concern they have.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-6861	Oppose the provision	AMEND Rule 3.11.5.2 (4) to specify details about fencing. AMEND Rule 3.11.5.2 (4) (c) to ensure grazing and cultivation on slopes are permitted but restricted in the winter months.
Schedule B - Nitrogen Reference Point	PC1-6860	Oppose the provision	AMEND Schedule B to ensure OVERSEER is will get tailored to goat farming and freely available to farmers. AND AMEND Schedule B to consider the ownership of Overseer.

## T.A. Reynolds Ltd

Submitter ID: 71446

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7158	Oppose the provision	WITHDRAW PPC1 in its entirety to allow for consultation with Hauraki Iwi AND RE-NOTIFY PPC1 with the inclusion of the withdrawn area. AND AMEND PPC1 so council works with industry partners to achieve the best outcomes. AND REMOVE use of the OVERSEER Model for vegetable production systems from PPC1.
Area covered by Chapter 3.11	PC1-7163	Oppose the provision	WITHDRAW PPC1 in its entirety to allow for consultation with Hauraki Iwi AND RE-NOTIFY PPC1 with the inclusion of the withdrawn area.
Background and explanation	PC1-7222	Oppose the provision	AMEND PPC1 to provide opportunity for commercial vegetable production on new sites in the Waikato river catchment. AND AMEND to ensure PPC1 provides for the establishment of an alternative method or model to establish a benchmark nitrogen and phosphorus discharge for commercial vegetable production systems from the OVERSEER Model. AND AMEND PPC1 to make an explicit statement to recognise permanent fruit production as a low intensity farm activity.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND 'Background and Explanation' to add an issue statement to address particular issues for the horticultural sector.
3.11.1 Values and uses for the Waikato and Waipa Rivers	PC1-7226	Support the provision	RETAIN Primary Production as a Mana Tangata value in Section 3.11.1.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-7229	Support the provision	RETAIN Objective 2.
Objective 3: 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	PC1-7230	Support the provision with amendments	AMEND PPC1 to provide flexibility to land managers seeking to achieve reductions collaboratively at a catchment or sub-catchment scale.
Policy 6: Restricting land use change	PC1-7124	Oppose the provision	No specific decision stated for Policy 6.
3.11.5 Rules	PC1-8262	Not stated	AMEND PPC1 so that it recognises permanent fruit production is a low intensity farming activity.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-7151	Oppose the provision	No specific decision stated for Rule 3.11.5.7.
Schedule B - Nitrogen Reference Point	PC1-8260	Oppose the provision	AMEND PPC1 so that it provides for the establishment of an alternative method or model to establish a benchmark nitrogen and phosphorus discharge for commercial vegetable production systems to the OVERSEER Model.
Schedule 1 - Requirements for Farm Environment Plans	PC1-7152	Not stated	Approve the New Zealand GAP scheme for vegetable production as satisfying the requirements of a Farm Environment Plan. (Schedule 1)

## Tadema, John

Submitter ID: 71416

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-10065	Oppose the provision	No specific decision is sought for PPC1.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-10058	Oppose the provision	AMEND Rule 3.11.5.3 as requested by Federated Farmers in their submission [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is: 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 REMOVE Rule 3.11.5.2 (4) (c).

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND ADD a NEW permitted activity rule to read:  <u>"The use of land for farming activities (excluding commercial vegetable production) where the property area is greater than 4.1 hectares is a Permitted Activity provided that:</u>  <u>1) The change in the use of land is not from non-milking dairy farming to milking dairy farming; or</u>  <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>  <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>  AND AMEND PPC1 so that normal farming activities in rural areas are permitted activities.  AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities.]</p>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-10059	Oppose the provision	<p>AMEND Rule 3.11.5.4 as requested by Federated Farmers in their submission  [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is:  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 REMOVE Rule 3.11.5.2 (4) (c).  AND ADD a NEW permitted activity rule to read:  <u>"The use of land for farming activities (excluding commercial vegetable production) where the property area is greater than 4.1 hectares is a Permitted Activity provided that:</u>  <u>1) The change in the use of land is not from non-milking dairy farming to milking dairy farming; or</u>  <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>  <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>  AND AMEND PPC1 so that normal farming activities in rural areas are permitted activities.  AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities.]</p>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-10060	Oppose the provision	<p>AMEND Rule 3.11.5.7 as requested by Federated Farmers in their submission  [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>
Schedule B - Nitrogen Reference Point	PC1-10062	Oppose the provision	<p>AMEND Schedule B as requested by Federated Farmers in their submission  [AMEND Schedule B 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 B.  AND ENSURE that the information sought by Council is no more than is necessary to achieve the purposes for which it is sought.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND ENSURE that the requirements set out in Schedule B match the Policies, Methods, definitions, etc, to which Schedule B relates.]
Schedule C - Stock exclusion	PC1-10063	Oppose the provision	AMEND Schedule C as requested by Federated Farmers in their submission [AMEND Schedule C 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 C 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 C match the Policies, Methods, definitions, etc. to which Schedule C relates AND REMOVE requirements for fencing off water bodies AND AMEND to adopt the Government's Clean Water Package 2017 stock exclusion standards as an interim measure AND DEVELOP more detailed proposals at a sub-catchment level later, through a freshwater management unit based assessment, and implemented then through a sub-catchment based plan change AND MAKE any consequential amendments to PPC1.]
Schedule 1 - Requirements for Farm Environment Plans	PC1-10064	Oppose the provision	AMEND Schedule 1 as requested by Federated Farmers in their submission [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.]

## Tamahere Community Committee

Submitter ID: 73090

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-7614	Oppose the provision	AMEND Rule 3.11.5.1 to increase the property land area from 2 hectares to 6 hectares.
Schedule A - Registration with Waikato Regional Council	PC1-7615	Oppose the provision	AMEND Schedule A to increase the property land area threshold for registration from 2 to 6 hectares.

# Taniwha Estate Ltd

Submitter ID: 72146

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6511	Support the provision with amendments	<p>AMEND PPC1 in accordance with the amendments proposed by DairyNZ and Fonterra.</p> <p>[DairyNZ: RETAIN PPC1 subject to the decision sought in Attachment 1 of the submission. AND AMEND PPC1 to provide for any consequential amendments that may be necessary to give effect to the decision sought in this submission.</p> <p>AND AMEND to provide any alternative relief that will give effect to this submission, including, where specific relief is sought, words or phrases to similar effect.]</p> <p>[Fonterra: RETAIN PPC1 subject to the decision sought in Attachment 1 of the submission. AND AMEND PPC1 to provide for any consequential amendments that may be necessary to give effect to the decision sought in this submission.</p> <p>AND AMEND to provide any alternative relief that will give effect to this submission, including, where specific relief is sought, words or phrases to similar effect.]</p>
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-6513	Support the provision with amendments	<p>AMEND PPC1 in accordance with the amendments proposed by DairyNZ and Fonterra.</p> <p>[DairyNZ do not have a specific decision sought for Objective 1.]</p> <p>[Fonterra: AMEND the reasons for adopting the Objective 1 to read: "...Objective 1 sets a long term <del>limits</del> <u>goal</u> for water quality consistent with the Vision and Strategy. Objective 1 sets aspirational 80-year <del>desired</del> water quality <del>targets</del> <u>states</u>, which result in improvements in water quality from the current state monitored in 2010-2014. The water quality <del>states</del> <u>attributes</u> listed in Table 3.11-1 that will be achieved by 2096 will be used to characterise the <del>desired</del> water quality of the different Freshwater Management Units when the effectiveness of the objective is assessed. <u>Objective 1 gives effect to the Vision and Strategy.</u>"]</p>
Policy 6: Restricting land use change	PC1-6515	Not stated	<p>AMEND PPC1 in accordance with the amendments proposed by DairyNZ and Fonterra.</p> <p>[DairyNZ: AMEND Policy 6 to read:</p> <p>"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.</p> <p>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><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> <p>[Fonterra: REMOVE 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>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>a. <u>Not result in increased diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens; and/or</u>  b. <u>Promote the implementation of Policy 16.</u>"]</p>
Policy 10: Provide for point source discharges of regional significance	PC1-6519	Not stated	<p>AMEND PPC1 in accordance with the amendments proposed by DairyNZ and Fonterra.  [DairyNZ do not have a specific decision sought for Policy 10.]  [Fonterra: AMEND Policy 10 to read:  "Policy 10: Provide for Point Source Discharge <u>from activities</u> of regional significance/....  When deciding resource consent applications for Point Source Discharge of nitrogen, phosphorus, sediment and microbial pathogens to water or onto or into land, <u>subject to Policy 11 and Policy 12</u>, provide for the:...""]</p>
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-6521	Not stated	<p>AMEND PPC1 in accordance with the amendments proposed by DairyNZ and Fonterra.  [DairyNZ do not have a specific decision sought for Policy 11.]  [Fonterra: AMEND Policy 11 to read:  "Policy 11: Application of Best Practicable Option <del>and mitigation or offset of effects</del> to Point Source Discharge.  Require any person undertaking a point source discharge of nitrogen, phosphorus, sediment or microbial pathogens to water or onto or into land in the Waikato and Waipā River catchments to adopt the Best Practicable Option* to avoid or mitigate the adverse effects of the discharge, at the time a resource consent application is decided"  AND ADD a NEW Policy 11A to read: "<u>Policy 11A: Offsetting the effects of Point Source Discharge</u>  Where it is not practicable to avoid or mitigate <del>all</del> <u>any</u> adverse effects, an offset measure may be proposed in an alternative location or locations to the point source discharge, <del>for the purpose of ensuring positive effects on the environment to lessen any residual adverse effects of the discharge(s) that will or may result from allowing the activity</del> provided that the:  a. <del>The P</del>primary discharge does not result in any significant toxic adverse effect at the point source discharge location; and  b. <del>The O</del>ffset measure is for the same contaminant; and  c. <del>The O</del>ffset measure occurs <del>preferably</del> within the same sub-catchment in which the primary discharge occurs and if this is not practicable, then within the same Freshwater Management Unit^ or a Freshwater Management Unit^ located upstream; <del>and</del>  <u>d. The offset measure is monitored and results in a net reduction in adverse environmental effects caused by the contaminant(s) being offset in the Point Source Discharge on the Waikato or Waipā River catchment; and</u>  e. <del>The O</del>ffset measure remains in place for the duration of the consent and is secured by consent condition <del>or another legally binding mechanism.</del>""]</p>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-6516	Not stated	<p>AMEND PPC1 in accordance with the amendments proposed by DairyNZ and Fonterra.  [DairyNZ: 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</u></p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>that the farm or enterprise has completed a Farm Environment Plan and are managing within their <u>Nitrogen Reference Point.</u>"]  [Fonterra: 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>  The following activities are non-complying activities (requiring resource consent):  <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>  i. <u>Woody vegetation to farming activities; or</u>  ii. <u>Any livestock grazing other than dairy farming to dairy farming; or</u>  iii. <u>Arable cropping to dairy farming; or</u>  iv. <u>Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5.</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..."  AND AMEND PPC1 as necessary to clarify that land use change within a property or enterprise (&gt;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>
Schedule 1 - Requirements for Farm Environment Plans	PC1-6517	Not stated	<p>AMEND PPC1 in accordance with the amendments proposed by DairyNZ and Fonterra.  [DairyNZ: AMEND Schedule 1 paragraph 2 to read:    "The Farm Environment Plan shall identify all <u>critical source areas</u> <del>sources</del> 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.  AND AMEND to 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.]  [Fonterra: 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 plan addresses the relevant matters in Section A.</u>"  AND ADD a new item 'g' to Section 2 (immediately above Section 3):  <u>"g. A description of any other wastewater irrigation or fertiliser management activities on the site including the use of fertilised replacements."</u></p>



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND Schedule 1 part 5 to read: "...5. A description of the following: a. <del>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 ...</del> "]
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-6514	Oppose the provision with amendments	AMEND PPC1 in accordance with the amendments proposed by DairyNZ and Fonterra. [DairyNZ: 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 Waipā 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> [Fonterra do not have a specific decision sought for Table 3.11-1.]

## Tapp, Kevin

Submitter ID: 73435

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7461	Oppose the provision	DELETE PPC1 in its entirety. If not deleted then AMEND to WITHDRAW the PPC1 until the Waikato Regional Council can treat the whole of its catchment as one AND AMEND to retain the intent of Healthy Rivers but ensure that the water quality targets are achievable AND AMEND to provide more clarity on what has been done to reduce other pollutants in order to achieve the targets. Pollutants such as cities, waste treatment plants, run-off from roads and rubbish dumps AND AMEND to provide clarity on what is being done to eliminate koi carp from the waterways AND AMEND to reduce the rates of Nitrogen applied to pasture, working towards a total ban.
Policy 6: Restricting land use change	PC1-7472	Oppose the provision	REMOVE the exceptions to Māori Owned Land from PPC1.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-7473	Oppose the provision	REMOVE the exceptions to Māori Owned Land from PPC1.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-7463	Oppose the provision	<p>DELETE provisions relating to stock exclusion from Rule 3.11.5.1.</p> <p>If not declined, then AMEND to provide for the ability to muster cattle through water bodies without having to develop a permitted stock crossing structure, which can be included in Farm Environment Plans with the number/head of cattle crossing at a time, amount of times a week crossing allowed etc,</p> <p>AND AMEND to focus on reducing impacts from intensive agriculture &gt;18su/ha,</p> <p>AND AMEND to provide for Farm Environment Plans to be produced by the landowner with Waikato Regional Council guidance and support,</p> <p>AND AMEND to provide for fencing to be subsidized by the Waikato Regional Council,</p> <p>AND AMEND to provide clearer guidelines,</p> <p>AND AMEND to provide for longer timeframes,</p> <p>AND AMEND to provide for flexibility in terrain that is difficult to fence.</p>
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-7464	Oppose the provision	<p>DELETE provisions relating to stock exclusion from Rule 3.11.5.2.</p> <p>If not declined, then AMEND to provide for the ability to muster cattle through water bodies without having to develop a permitted stock crossing structure, which can be included in Farm Environment Plans with the number/head of cattle crossing at a time, amount of times a week crossing allowed etc</p> <p>AND AMEND to focus on reducing impacts from intensive agriculture &gt;18su/ha</p> <p>AND AMEND to provide for Farm Environment Plans to be produced by the landowner with Waikato Regional Council guidance and support</p> <p>AND AMEND to provide for fencing to be subsidized by the Waikato Regional Council</p> <p>AND AMEND to provide clearer guidelines</p> <p>AND AMEND to provide for longer timeframes</p> <p>AND AMEND to provide for flexibility in terrain that is difficult to fence</p> <p>AND DELETE provisions relating to restricting stock rates or preventing increases in stocking rate from Rule 3.11.5.2 in its entirety</p> <p>If not deleted then AMEND to enable flexibility in land use, discharges and stocking rates</p> <p>AND DELETE any standards or clauses which hold land uses to historic discharge levels or stocking rates</p> <p>AND DELETE provisions relating to the inability to increase discharge of nitrogen, phosphorous, sediment and pathogens and REPLACE with clear accurate measuring of these discharges</p> <p>AND AMEND to adopt a sub-catchment approach to addressing contaminants that are relevant to each farm</p> <p>AND AMEND to provide for Farm Environment Plans to determine what would work best on each farm, based on science to determine which contaminants are an issue in each sub-catchment</p> <p>AND DELETE the Nitrogen leaching grandparented to highest annual loss rate calculated for either 2014/15 or 2015/16 and must be no greater than 15kg/n/ha/yr.</p> <p>DELETE the Nitrogen reference Point and the use of the OVERSEER Model in its entirety.</p>
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-7465	Oppose the provision	<p>DELETE provisions relating to stock exclusion from Rule 3.11.5.3.</p> <p>If not declined, then AMEND to provide for the ability to muster cattle through water bodies without having to develop a permitted stock crossing structure, which can be included in Farm</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			Environment Plans with the number/head of cattle crossing at a time, amount of times a week crossing allowed etc, AND AMEND to focus on reducing impacts from intensive agriculture >18su/ha, AND AMEND to provide for Farm Environment Plans to be produced by the landowner with Waikato Regional Council guidance and support, AND AMEND to provide for fencing to be subsidized by the Waikato Regional Council, AND AMEND to provide clearer guidelines, AND AMEND to provide for longer timeframes, Delete the Nitrogen Reference Point and the use of the OVERSEER Model in its entirety, AND AMEND to provide for flexibility in terrain that is difficult to fence.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-7466	Oppose the provision	DELETE provisions relating to stock exclusion from Rule 3.11.5.4. If not declined, then AMEND to provide for the ability to muster cattle through water bodies without having to develop a permitted stock crossing structure, which can be included in Farm Environment Plans with the number/head of cattle crossing at a time, amount of times a week crossing allowed etc, AND AMEND to focus on reducing impacts from intensive agriculture >18su/ha, AND AMEND to provide for Farm Environment Plans to be produced by the landowner with Waikato Regional Council guidance and support. Each farm is unique and needs to be assessed individually to understand if it's possible to fence or not AND AMEND to provide for fencing to be subsidized by the Waikato Regional Council, AND AMEND to provide clearer guidelines, AND AMEND to provide for longer timeframes, DELETE the Nitrogen Reference Point and the use of the OVERSEER Model in its entirety, AND AMEND to provide for flexibility in terrain that is difficult to fence.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-7467	Oppose the provision	DELETE provisions relating to stock exclusions from Rule 3.11.5.6. If not declined, then AMEND to provide for the ability to muster cattle through water bodies without having to develop a permitted stock crossing structure, which can be included in Farm Environment Plans with the number/head of cattle crossing at a time, amount of times a week crossing allowed etc AND AMEND to provide for fencing to be subsidized by the Waikato Regional Council AND AMEND to provide clearer guidelines AND AMEND to provide for longer timeframes AND AMEND to provide for flexibility in terrain that is difficult to fence.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13104	Oppose the provision	AMEND Rule 3.11.5.6 to focus on reducing impacts from intensive agriculture >18su/ha.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13105	Oppose the provision	AMEND Rule 3.11.5.6 to provide for Farm Environment Plans to be produced by the landowner with Waikato Regional Council guidance and support.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-7470	Oppose the provision	DELETE Rule 3.11.5.7 in its entirety AND REMOVE the exceptions to Māori Owned Land.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-7469	Oppose the provision	DELETE provisions relating to the OVERSEER Model from Schedule B in its entirety, AND DELETE reference to a Nitrogen Reference Point from PPC1, AND DELETE any standards or clauses from PPC1 which hold land uses to historic discharge levels or stocking rates, AND ADD a provision to PPC1 that cuts back the input allowance of nitrogen applied to pasture to 10-20 units.
Schedule C - Stock exclusion	PC1-7462	Oppose the provision	DELETE Schedule C in its entirety. If not declined, then AMEND to provide for the ability to muster cattle through water bodies without having to develop a permitted stock crossing structure, which can be included in Farm Environment Plans with the number/head of cattle crossing at a time, amount of times a week crossing allowed etc, AND AMEND to focus on reducing impacts from intensive agriculture >18su/ha, AND AMEND to provide for Farm Environment Plans to be produced by the landowner with Waikato Regional Council guidance and support, AND AMEND to provide for fencing to be subsidized by the Waikato Regional Council, AND AMEND to provide clearer guidelines, AND AMEND to provide for longer timeframes, AND AMEND to provide for flexibility in terrain that is difficult to fence.
Schedule 1 - Requirements for Farm Environment Plans	PC1-7468	Support the provision with amendments	AMEND Schedule 1 to ensure Farm Environment Plans determine what would work best on each farm based on science to determine which contaminants are an issue in each sub-catchment AND AMEND Farm Environment Plans to focus on addressing actual risk targeting critical source areas rather than requiring blanket stock exclusion AND AMEND to ensure Farm Environment Plan are produced by the land owner with Waikato Regional Council guidance and support.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12529	Oppose the provision with amendments	Schedule 1 - DELETE blanket stock exclusion requirements and enable case by case decisions and tailored management in consultation with the land owner.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12530	Oppose the provision with amendments	Schedule 1 - DELETE provisions relating to Nitrogen Reference Point AND AMEND to adopt a sub-catchment approach to contaminants that are relevant to each farm AND DELETE provisions relating to the OVERSEER Model from Schedule 1 in its entirety.

## Tapp, Warren

Submitter ID: 73013

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-1847	Oppose the provision	DELETE PPC1 OR WITHDRAW PPC1 until the Waikato Regional Council can treat the whole of the catchment as one.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-1940	Support the provision with amendments	RETAIN the intent of Healthy Rivers but ensure the water quality targets are achievable and work towards a total ban on applying nitrogen to pasture. Objective 1
Policy 5: Staged approach	PC1-1941	Support the provision with amendments	RETAIN the intent of Healthy Rivers but ensure the water quality targets are achievable and work towards a total ban on applying nitrogen to pasture. Policy 5.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-1932	Oppose the provision	DELETE Policy 16.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-2150	Oppose the provision	DELETE Point 2 of Rule 3.11.5.1 in its entirety.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-1900	Oppose the provision	DELETE Point 3(b)(i) of Rule 3.11.5.2 and any other provisions that restrict the stocking rate or prevent increases in the stocking rate. DELETE Point 4(b) of Rule 3.11.5.2 and any other standards or clauses that hold land rates to historic nitrogen, phosphorous, sediment and pathogens discharge levels until clear/accurate measurement of these discharges can be established. AMEND Rule 3.11.5.2 to reduce the input allowance of nitrogen applied to pasture to 10-20 units. DELETE Point 2 of Rule 3.11.5.2 in its entirety.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-1921	Oppose the provision	DELETE Point 2 of Rule 3.11.5.3 and any other standards or clauses that hold land rates to historic nitrogen, phosphorous, sediment and pathogens discharge levels until clear/accurate measurement of these discharges can be established. DELETE Point 3 of Rule 3.11.5.3 in its entirety.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-1922	Oppose the provision	DELETE Point 5 of Rule 3.11.5.4 and any other standards or clauses that hold land rates to historic nitrogen, phosphorous , sediment and pathogens discharge levels until clear/accurate measurement of these discharges can be established. AND DELETE Point 5(d) of Rule 3.11.5.4 in its entirety.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-2152	Oppose the provision	DELETE requirements that seek to exclude stock from waterways in Rule 3.11.5.6.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-1933	Oppose the provision	DELETE Rule 3.11.5.7.
Schedule B - Nitrogen Reference Point	PC1-1913	Oppose the provision	DELETE the provisions in Schedule B that mandate the use of OVERSEER to determine the Nitrogen Reference Point.
Schedule C - Stock exclusion	PC1-1848	Oppose the provision	DELETE Schedule C in its entirety.
Schedule 1 - Requirements for Farm Environment Plans	PC1-1899	Oppose the provision with amendments	DELETE Point 5 of Schedule 1 and any other standards or clauses that hold land rates to historic nitrogen, phosphorous , sediment and pathogens discharge levels until clear/accurate measurement of these discharges can be established

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND Schedule 1 to reduce the input allowance of nitrogen applied to pasture to 10-20 units.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12531	Support the provision with amendments	AMEND Schedule 1 so Farm Environment Plans are used to determine what would work best on each farm and adopt a science based sub-catchment approach to determine which contaminants are relevant to each farm. AMEND Farm Environment Plans to focus on addressing actual risk targeting critical source areas rather than requiring blanket stock exclusion through permanent fencing. AMEND Schedule 1 to allow for Farm Environment Plans to be produced by the landowner with Waikato Regional Council guidance.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12532	Oppose the provision	DELETE the stock exclusion provisions of Schedule 1 and allow for case-by-case decisions and tailored management in consultation with the land owner. AMEND Farm Environment Plans to allow for the ability to muster cattle through a water body without having to develop a permitted stock crossing structure. Include regulations in the Farm Environment Plans to detail the number of head of stock crossing at a time, amount of time a week crossing allowed, etc.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-2136	Support the provision with amendments	RETAIN the intent of Healthy Rivers but ensure the water quality targets are achievable and work towards a total ban on applying nitrogen to pasture.

## Tarr, Teresa Brigid

Submitter ID: 73962

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-4496	Support the provision with amendments	AMEND Rule 3.11.5.3 so that the provision requires alternative water sources and crossing structures, rather than requiring fencing within the time-frame currently required to fence waterways. AND AMEND to ensure Farm Environment Plans should specify fencing requirements.
Schedule B - Nitrogen Reference Point	PC1-4500	Oppose the provision with amendments	AMEND Schedule B to ensure that a LUC component, is linked to an appropriate maximum stocking rate for each LUC component of the property.
Schedule C - Stock exclusion	PC1-4499	Support the provision with amendments	AMEND Schedule C so that the provision requires alternative water sources and crossing structures, rather than requiring fencing within the time-frame currently required to fence waterways. AND AMEND to ensure Farm Environment Plans should specify fencing requirements.

# Taupo District Council

Submitter ID: 74207

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-9292	Support the provision with amendments	Recognise the substantial and ongoing commitment to improving the water quality in Lake Taupō in PPC1
3.11.2 Objectives	PC1-8094	Support the provision	RETAIN the intent of the objectives.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-8096	Support the provision	RETAIN the intent of Objective 1.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-8098	Support the provision	RETAIN the intent of Objective 2.
Objective 3: 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	PC1-8100	Support the provision	RETAIN the intent of Objective 3.
Objective 4: People and community resilience	PC1-8102	Support the provision	AMEND to clarify what the staged approach means, AND AMEND to clarify what is intended by the term 'short-term'.
3.11.3 Policies	PC1-8106	Support the provision	RETAIN the intent of the policies, AND AMEND to amalgamate Policies 1, 2, 3 and 4 and using the information to inform the implementation methods and rules. AND ADD a NEW Policy that provides for an increase in contaminant concentrations from regionally significant infrastructure to provide for population growth in urban areas.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-8108	Support the provision	RETAIN the intent of Policy 1.
Policy 5: Staged approach	PC1-8109	Support the provision	RETAIN the intent of Policy 5.
Policy 7: Preparing for allocation in the future	PC1-8110	Support the provision with amendments	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.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-8111	Support the provision	RETAIN the intent of Policy 9 AND AMEND to ensure that the required funding is provided to enable the effective implementation of Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-8112	Support the provision	RETAIN the intent of Policy 10 AND AMEND to recognise the monitoring undertaken during the operation of consented wastewater activities when assessing and considering resource consent renewal

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to ensure the definition of regionally significant infrastructure includes storm water infrastructure.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-8115	Support the provision with amendments	AMEND Policy 11 to ensure that offsetting is considered a mitigation measure rather than being considered only after all other options to avoid or mitigate have been considered AND AMEND to recognise the significant contribution made to date by the Taupo district communities AND AMEND to provide for offsetting in the Lake Taupō catchment as the Freshwater Management Unit above the Waikato River.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-8116	Support the provision	RETAIN Policy 12.
Policy 13: Point sources consent duration	PC1-8117	Support the provision with amendments	AMEND Policy 13 to ensure the consent term is 35 years.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-8118	Support the provision	RETAIN Policy 17.
3.11.4.1 Working with others	PC1-8120	Support the provision	RETAIN Method 3.11.4.1.
3.11.4.3 Farm Environment Plans	PC1-8121	Support the provision with amendments	RETAIN the intent of Method 3.11.4.3, AND AMEND to include provision of a funding stream to assist in the development and implementation of Farm Environment Plans.
3.11.4.5 Sub-catchment scale planning	PC1-8125	Support the provision with amendments	AMEND Method 3.11.4.5 to provide timeframes, funding options and priorities.
3.11.4.6 Funding and implementation	PC1-8126	Support the provision with amendments	RETAIN Method 3.11.4.6.
3.11.4.7 Information needs to support any future allocation	PC1-8127	Support the provision	RETAIN the intent of Method 3.11.4.7.
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-8128	Support the provision with amendments	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 AND ENSURE that Taupo District Council is involved in the development of the allocation framework.
3.11.4.9 Managing the effects of urban development	PC1-8146	Support the provision with amendments	RETAIN the intent of Method 3.11.4.9. AND ENSURE Taupo District Council is involved in the development of solutions to manage the effects of urban development.
3.11.4.10 Accounting system and monitoring	PC1-8155	Support the provision	RETAIN the intent of Method 3.11.4.10 AND CLARIFY the expected timeframes for data collection and the accounting system.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-8157	Support the provision	RETAIN Method 3.11.4.12
3.11.5 Rules	PC1-8158	Support the provision with amendments	AMEND to simplify the rules AND REMOVE provision of information requirement where the information is already held by the regional council.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-8161	Support the provision with amendments	AMEND to clarify the area of land that the stocking rate is applied over. The preferred approach is to apply the stocking rate over the total property area AND AMEND to clarify whether parts of a property that cannot be used for farming activities are excluded from the total property area AND AMEND to include the 2 hectare provision from Schedule A in Rule 3.11.5.1.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-8164	Support the provision with amendments	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.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-8168	Support the provision	RETAIN the use of a Certified Industry Scheme as provided for in Rule 3.11.5.3.
Schedule B - Nitrogen Reference Point	PC1-8169	Support the provision with amendments	Ensure that Taupō District Council is involved in the development of the allocation framework. Schedule B.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-8170	Support the provision with amendments	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.
Additions to Glossary of Terms	PC1-8172	Support the provision	AMEND the additions to the Glossary of Terms to include a definition for regionally significant infrastructure, which includes storm water infrastructure AND AMEND to include a definition for the term 'urban' to assist with implementing Schedule A.
Definition - Farming activities	PC1-8171	Support the provision with amendments	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.

## Taupo Lake Care Incorporated

Submitter ID: 61093

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-9348	Oppose the provision with amendments	DELETE from Objective 1 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments AND MAKE any other consequential amendments.
Objective 4: People and community resilience	PC1-9350	Oppose the provision with amendments	DELETE from Objective 4 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments. AND MAKE any other consequential amendments.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-9352	Oppose the provision	DELETE from Policy 2 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12932	Support the provision with amendments	Policy 2 - develop a measurement system that targets E.coli and phosphorous as a precursor for the whole Farm Environment Plan.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12933	Support the provision with amendments	Policy 2 - develop a stock exclusion measure that takes into account the length of waterway excluded, and/or the amount of fencing, and/or the area of planting, and /or the edge of field improvements and stock intensity AND AMEND so that once the stock exclusion and edge of field improvements are achieved an Overseer based program could be considered AND MAKE any other consequential amendments.
Policy 7: Preparing for allocation in the future	PC1-9353	Oppose the provision with amendments	DELETE from Policy 7 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments. AND MAKE any other consequential amendments.
3.11.4.2 Certified Industry Scheme	PC1-9340	Support the provision with amendments	ADD to Method 3.11.4.2 a qualification to the Certified Farm Environment Planner and Certified Farm Nutrient Advisor requirements that allows the operator of an enterprise or property to take the role of the Certified Farm Environment Planner and Certified Farm Nutrient Advisor for that enterprise or property.
3.11.4.10 Accounting system and monitoring	PC1-9370	Not stated	CLARIFY that Waikato Regional Council is to protect intellectual property. Method 3.11.4.10 AND provide a publicly accessible register of property Nitrogen Discharge Allowance.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-9355	Oppose the provision with amendments	DELETE from Rule 3.11.5.2 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments. AND MAKE any other consequential amendments.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-9357	Support the provision with amendments	DELETE from Rule 3.11.5.3 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments AND develop a measurement system that targets E.coli and phosphorous as a precursor for the whole Farm Environment Plan AND develop a stock exclusion measure that takes into account the length of waterway excluded, and/or the amount of fencing, and/or the area of planting, and /or the edge of field improvements and stock intensity AND AMEND so that once the stock exclusion and edge of field improvements are achieved an Overseer based program could be considered AND MAKE any other consequential amendments.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-9358	Support the provision with amendments	RETAIN the 5 year rolling average if the Nitrogen Reference Point is retained OR DELETE from Rule 3.11.5.3 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments AND AMEND to include a measurement system that targets E.coli and phosphorous as a precursor for the whole Farm Environment Plan

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to include a stock exclusion measure that takes into account the length of waterway excluded, and/or the amount of fencing, and/or the area of planting, and /or the edge of field improvements and stock intensity AND AMEND so that once the stock exclusion and edge of field improvements are achieved an Overseer based program could be considered AND MAKE any other consequential amendments.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-9359	Oppose the provision with amendments	DELETE from Rule 3.11.5.5 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments. AND MAKE any other consequential amendments.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-9360	Oppose the provision with amendments	DELETE from Rule 3.11.5.6 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments. AND MAKE any other consequential amendments.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-9361	Oppose the provision with amendments	DELETE from Rule 3.11.5.7 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments. AND MAKE any other consequential amendments.
Schedule B - Nitrogen Reference Point	PC1-9362	Oppose the provision with amendments	DELETE from Schedule B the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments. AND MAKE any other consequential amendments.
Schedule 1 - Requirements for Farm Environment Plans	PC1-9343	Support the provision with amendments	AMEND Schedule 1 to include a stock exclusion measure that takes into account the length of waterway excluded, and/or the amount of fencing, and/or the area of planting, and /or the edge of field improvements and stock intensity. AND AMEND so that once the stock exclusion and edge of field improvements are achieved an Overseer based program could be considered. AND MAKE any other consequential amendments.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12533	Support the provision with amendments	Schedule 1 - RETAIN the 5 year rolling average if the Nitrogen Reference Point is retained. OR DELETE from Schedule 1 the Nitrogen Reference Point and the use of the OVERSEER Model for regulatory purposes and any consequential amendments. AND MAKE any other consequential amendments.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12534	Support the provision with amendments	AMEND Schedule 1 to include a measurement system that targets E.coli and phosphorous as a precursor for the whole Farm Environment Plan. AND MAKE any other consequential amendments.
Schedule 2 - Certification of Industry Schemes	PC1-9339	Support the provision with amendments	ADD to Schedule 2 a qualification to the Certified Farm Environment Planner and Certified Farm Nutrient Advisor requirements that allows the operator of an enterprise or property to take the role of the Certified Farm Environment Planner and Certified Farm Nutrient Advisor for that enterprise or property.
Definition - Enterprise	PC1-9053	Not stated	AMEND to provide an acceptable method catering for enterprises that cross catchment borders and work with Taupō Lake Care Inc to develop this AND advocate for a national solution to this problem.
Readers Guide	PC1-9315	Not stated	AMEND all references for Nitrogen Reference Point to Total Annual Nitrogen Discharge (TAND) or Nitrogen Discharge Allowance (NDA) per hectare AND AMEND all references to the Farm Environment Plan to Nutrient Management Plan (NMP)

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND ADD a regional council initiative to have national terms / acronyms for similar regulatory concepts.

## Taylor, Ian McNicol

Submitter ID: 73406

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-7575	Support the provision with amendments	AMEND Objective 2/PPC1/Policies by providing more flexibility. AND AMEND to include a commitment to monitor the actual total impact of these changes once implemented.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-7579	Oppose the provision with amendments	Reassess Policy 1 c) using science to assess the amount of nitrogen leaching off steep country relative to the flat land AND AMEND Policy 1 c) to include the use of nutrient contaminant areas with riparian planting to reduce sediment runoff.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-7581	Support the provision with amendments	AMEND Policy 2 c) rather than using the Nitrogen Reference Point as the major target, use the Farm Environment Plans for nutrient/sediment loss.
Policy 6: Restricting land use change	PC1-7584	Support the provision with amendments	AMEND Policy 6 to adopt a more flexible approach to these future uncertainties.

## Taylor, Janet

Submitter ID: 71081

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-36	Support the provision with amendments	AMEND Method 3.11.4.12 to include provisions for independent, iwi-led science initiatives to collate factual data on the effectiveness of drainage and plant-based water filtering systems.
Schedule B - Nitrogen Reference Point	PC1-26	Support the provision with amendments	AMEND Schedule B so that the OVERSEER Model is developed further, made more accurate and used more appropriately.
Schedule 1 - Requirements for Farm Environment Plans	PC1-17	Support the provision with amendments	AMEND Schedule 1 so that the soil erosion mitigation factors include vegetative control measures. The submission requests scientific study quantify the economic value of restoring flax at stream and river margins to improve water quality by soils and nutrient trapping. The submission requests that the data and evidence in Erosion and Sediment Control Guidelines for Vegetable Production is produced before it is scientifically sound.

## Taylor, Kenneth Rowland John

Submitter ID: 71435

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-1478	Oppose the provision	WITHDRAW PPC1 until the whole catchment can be treated as one.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-1473	Support the provision with amendments	AMEND Rule 3.11.5.1 to determine stock exclusion requirements on a farm by farm basis. AND ANY consequential amendments.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-1474	Support the provision with amendments	AMEND Rule 3.11.5.2 to determine stock exclusion requirements on a farm by farm basis. AND any consequential amendments.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-1475	Support the provision with amendments	AMEND Rule 3.11.5.3 to determine stock exclusion requirements on a farm by farm basis. AND any consequential amendments.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-1476	Support the provision with amendments	AMEND Rule 3.11.5.4 to determine stock exclusion requirements on a farm by farm basis. AND any consequential amendments.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-1477	Support the provision with amendments	AMEND Rule 3.11.5.6 to determine stock exclusion requirements on a farm by farm basis AND MAKE any consequential amendments.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13107	Oppose the provision with amendments	Rule 3.11.5.6 Land Use Change Rules: AMEND the land use change rules to be considered on a farm by farm basis AND any consequential amendments.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-1479	Oppose the provision	AMEND Rule 3.11.5.7, the land use change rules, to be considered on a farm by farm basis. AND MAKE any consequential amendments.
Schedule C - Stock exclusion	PC1-1472	Support the provision with amendments	AMEND Schedule C to determine stock exclusion requirements on a farm by farm basis. AND MAKE any consequential amendments.

## Taylor, Keri Anne

Submitter ID: 72565

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-9931	Oppose the provision	WITHDRAW the entire PPC1 until the whole catchment can be included.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-9932	Oppose the provision with amendments	AMEND Rule 3.11.5.7 so that the rule is applied on a farm-by-farm basis AND AMEND to enable land use change that is in keeping with environmental and economic standards for the farm.
Schedule C - Stock exclusion	PC1-9929	Oppose the provision	AMEND Schedule C align with national standards AND AMEND PPC1 to ensure stock exclusion rules are personalised to each farm AND AMEND to ensure that Farm Environment Plans are used to target areas of high concern.
Schedule 1 - Requirements for Farm Environment Plans	PC1-9933	Support the provision with amendments	AMEND Schedule 1 to ensure Farm Environment Plans tailor rules on a farm-by-farm basis according to the environmental impact the farm is having on waterways.

## Taylor, Leigh

Submitter ID: 72901

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-8554	Oppose the provision	DELETE Rule 3.11.5.2 (3) and (4).

## Taylor and Mellow, Mary Jane and Carwyn David

Submitter ID: 71441

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-1723	Oppose the provision	WITHDRAW the PPC1 and treat the whole catchment as one.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-1791	Oppose the provision with amendments	AMEND Objective 1 by withdrawing the plan and replace with objectives and targets that are achievable and consider the involvement of all sectors within the community. These objectives should ensure that the health and well-being of people and communities are safeguarded as outlined under Objectives 2 and 4.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-1711	Support the provision with amendments	AMEND Rule 3.11.5.1 by providing the requirement to exclude cattle from waterbodies that is determined on a sub-catchment and individual farm basis where there is a scientifically proven water quality issue in relation to stock in water bodies AND AMEND so that individual farmers are given subsidies to support or fully cover the cost of compliance. AND MAKE any other consequential amendments.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-1715	Support the provision with amendments	AMEND Rule 3.11.5.2 by providing the requirement to exclude cattle from waterbodies that is determined on a sub-catchment and individual farm basis where there is a scientifically proven water quality issue in relation to stock in water bodies

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND so that individual farmers are given subsidies to support or fully cover the cost of compliance. AND MAKE any other consequential amendments.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-1716	Support the provision with amendments	AMEND Rule 3.11.5.3 by providing the requirement to exclude cattle from waterbodies that is determined on a sub-catchment and individual farm basis where there is a scientifically proven water quality issue in relation to stock in water bodies. AMEND so that individual farmers are given subsidies to support or fully cover the cost of compliance. Farm Environment Plans AMEND to allow a low cost self-generated Farm Environmental Plan. Support the Council to work with industry bodies to develop Certified Industry Schemes. AMEND to require Farm Environmental Plans in sub-catchments where improvements required are determined by science. AMEND to tailor Farm Environmental Plans to individual properties rather than applying blanket regulatory standards and establish an independent panel to mediate contested points between farmers and Council without the expense of an Environment Court appeal. AND MAKE any other consequential amendments. Nitrogen Reference Point AMEND to remove the requirement to manage a Nitrogen Reference Point based upon stocking rate and allow for seasonal fluctuations based on climate through a farm by farm approach. AMEND to ensure that Best Management Practices are applied when using OVERSEER including input standards, applying farm specific information and reducing use of standardised input parameters AND ADD soil tests as possible marker for nutrient loss.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-1718	Support the provision with amendments	AMEND Rule 3.11.5.4 by providing the requirement to exclude cattle from waterbodies that is determined on a sub-catchment and individual farm basis where there is a scientifically proven water quality issue in relation to stock in water bodies. AMEND so that individual farmers are given subsidies to support or fully cover the cost of compliance. Farm Environment Plans AMEND to allow a low cost self-generated Farm Environmental Plan. Support the Council to work with industry bodies to develop Certified Industry Schemes. AMEND to require Farm Environmental Plans in sub-catchments where improvements required are determined by science. AMEND to tailor Farm Environmental Plans to individual properties rather than applying blanket regulatory standards AND establish an independent panel to mediate contested points between farmers and Council without the expense of an Environment Court appeal. AND MAKE any other consequential amendments. Nitrogen Reference Point AMEND to remove the requirement to manage a Nitrogen Reference Point based upon stocking rate and allow for seasonal fluctuations based on climate through a farm by farm approach.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AMEND to ensure that Best Management Practices are applied when using OVERSEER including input standards, applying farm specific information and reducing use of standardised input parameters. AND ADD soil tests as possible marker for nutrient loss.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-1766	Oppose the provision with amendments	AMEND 3.11.5.5 to remove the requirement to manage a Nitrogen Reference Point based upon stocking rate and allow for seasonal fluctuations based on climate through a farm by farm approach. AMEND to ensure that Best Management Practices are applied when using OVERSEER including input standards, applying farm specific information and reducing use of standardised input parameters. AND ADD soil tests as possible marker for nutrient loss.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-1721	Support the provision with amendments	AMEND Rule 3.11.5.6 by providing the requirement to exclude cattle from waterbodies that is determined on a sub-catchment and individual farm basis where there is a scientifically proven water quality issue in relation to stock in water bodies AND AMEND so that individual farmers are given subsidies to support or fully cover the cost of compliance.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13108	Oppose the provision with amendments	AMEND Rule 3.11.5.6 to allow a low cost self-generated Farm Environmental Plan AND ENSURE the Council works with industry bodies to develop Certified Industry Schemes AND AMEND to require Farm Environmental Plans in sub-catchments where improvements required are determined by science AND AMEND to tailor Farm Environmental Plans to individual properties rather than applying blanket regulatory standards AND CONSIDER establishing an independent panel to mediate contested points between farmers and Council without the expense of an Environment Court appeal AND MAKE any other consequential amendments.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13109	Oppose the provision with amendments	AMEND Rule 3.11.5.6 to remove the requirement to manage a Nitrogen Reference Point based upon stocking rate and allow for seasonal fluctuations based on climate through a farm by farm approach AND AMEND to ensure that Best Management Practices are applied when using the OVERSEER Model including input standards, applying farm specific information and reducing use of standardised input parameters AND MAKE any consequential amendments.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13110	Oppose the provision with amendments	Rule 3.11.5.6 - ADD soil tests as possible marker for nutrient loss AND AMEND the land use change rules to be determined on a sub-catchment and farm by farm basis. Consider land class rather than current land use as the basis for land use change possibility AND AMEND to allow flexibility by developing policies and rules which relate to managing adverse effects rather than a blanket rule which is based on existing land use AND MAKE any consequential amendments.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-1768	Oppose the provision with amendments	AMEND Rule 3.11.5.7 to remove the requirement to manage a Nitrogen Reference Point based upon stocking rate and allow for seasonal fluctuations based on climate through a farm by farm approach. AMEND to ensure that Best Management Practices are applied when using OVERSEER including input standards, applying farm specific information and reducing use of standardised input parameters. AND ADD soil tests as possible marker for nutrient loss. Restricting Land Use Change AMEND the land use change rules to be determined on a sub-catchment and farm by farm basis. Consider land class rather than current land use as the basis for land use change possibility. AMEND to allow flexibility by developing policies and rules which relate to managing adverse effects rather than a blanket rule which is based on existing land use. AND MAKE any consequential amendments.
Schedule B - Nitrogen Reference Point	PC1-1770	Oppose the provision with amendments	AMEND Schedule B to remove the requirement to manage a Nitrogen Reference Point based upon stocking rate and allow for seasonal fluctuations based on climate through a farm by farm approach. AMEND to ensure that Best Management Practices are applied when using OVERSEER including input standards, applying farm specific information and reducing use of standardised input parameters. AND ADD soil tests as possible marker for nutrient loss.
Schedule C - Stock exclusion	PC1-1706	Support the provision with amendments	AMEND Schedule C by providing the requirement to exclude cattle from waterbodies that is determined on a sub-catchment and individual farm basis where there is a scientifically proven water quality issue in relation to stock in water bodies. AMEND Schedule C so that individual farmers are given subsidies to support or fully cover the cost of compliance. AND MAKE any other consequential amendments.
Schedule 1 - Requirements for Farm Environment Plans	PC1-1772	Oppose the provision with amendments	AMEND Schedule 1 to allow a low cost self-generated Farm Environmental Plan. AND support the Council to work with industry bodies to develop Certified Industry Schemes AND AMEND to require Farm Environmental Plans in sub-catchments where improvements required are determined by science AND AMEND to tailor Farm Environmental Plans to individual properties rather than applying blanket regulatory standards AND establish an independent panel to mediate contested points between farmers and Council without the expense of an Environment Court appeal AND MAKE any other consequential amendments.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-1794	Oppose the provision with amendments	AMEND by withdrawing PPC1 and replace with objectives and targets that are achievable and consider the involvement of all sectors within the community. These objectives should ensure that the health and well-being of people and communities are safeguarded as outlined under objectives 2 and 4.
Definition - Stock unit	PC1-1771	Oppose the provision with amendments	AMEND the definition of a stock unit by using actual weights that provide accurate stock unit measurements under 'Definition - Stock Unit'.

## TCM Properties Ltd

Submitter ID: 73268

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-9530	Oppose the provision	No specific decision sought for PPC1.

## Te Arawa River Iwi Trust

Submitter ID: 73697

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-11821	Support the provision	RETAIN and AMEND PPC1 as detailed in the specific submission points.
3.11.2 Objectives	PC1-11777	Support the provision	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units.</u> <u>Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u> " AND ADD Reasons for adopting Objective 6 to read: " <u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u> "
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-11771	Support the provision with amendments	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..."
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-11772	Support the provision with amendments	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity.</u> "
Objective 3: 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	PC1-11774	Support the provision	RETAIN Objective 3.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 4: People and community resilience	PC1-11775	Support the provision	RETAIN Objective 4.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-11776	Support the provision	RETAIN Objective 5.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-11778	Support the provision	RETAIN Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-11779	Support the provision	RETAIN Policy 2.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-11780	Support the provision	RETAIN Policy 3.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-11781	Support the provision	RETAIN Policy 4.
Policy 5: Staged approach	PC1-11782	Support the provision	RETAIN Policy 5.
Policy 6: Restricting land use change	PC1-11783	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 <del>generally</del> not be granted. Land use change consent... that demonstrate <del>clear and enduring</del> <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> "
Policy 7: Preparing for allocation in the future	PC1-11784	Support the provision with amendments	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and <del>any</del> future property or... pathogens that <del>will</del> <u>may</u> be required by... that will assist in <del>defining 'land suitability'</del> <u>preparing any new allocation or management regime. ...</u> c. Minimise social disruption and costs in transition to <del>the 'land suitability'</del> any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability <del>will</del> <u>may</u> consider the following criteria:.. c. the natural capacity of the landscape <del>scope</del> <u>within a sub-catchment</u> to attenuate contaminant loss; and..."
Policy 8: Prioritised implementation	PC1-11785	Support the provision	RETAIN Policy 8.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-11786	Support the provision	RETAIN Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-11787	Support the provision with amendments	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, <del>provide</del> <u>have regard to the continued operation of:</u> a. <del>Continued operation of</del> regionally significant infrastructure'; and b. <del>Continued operation of</del> regionally significant industry'."
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-11788	Support the provision	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects <del>to</del> <u>from</u> point source discharges... Require any person undertaking a point source discharge... effects of the discharge <del>at the time a resource consent application is decided</del> . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to <del>lessen any</del> <u>by offsetting</u> residual adverse effects of the discharge..."
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-11789	Support the provision with amendments	AMEND Policy 12 to read: "Consider the contribution made by a... microbial pathogen <del>catchment</del> loads <u>within a sub-catchment</u> and the impact of that contribution on the <u>likely</u> achievement of the... <del>d. The diminishing return on investment in the treatment plant upgrades in respect of any resultant reduction in nitrogen, phosphorus, sediment or microbial pathogens when treatment plant processes are already achieving a high level of contaminant reduction through the application of the Best Practicable Option*.</del> "
Policy 13: Point sources consent duration	PC1-11790	Support the provision with amendments	AMEND Policy 13 to read: "When determining the... a. <del>A consent term exceeding 25 years, where</del> <u>the applicant demonstrates the approaches...</u> "
Policy 14: Lakes Freshwater Management Units	PC1-11791	Support the provision with amendments	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-11792	Support the provision	RETAIN Policy 16.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-11793	Support the provision	RETAIN Policy 17.
3.11.4 Implementation methods	PC1-11806	Support the provision with amendments	ADD a NEW Method to read: " <u>3.11.4.13 Decision support system</u> <u>The Waikato Regional Council working with regional stakeholders will:</u> a. <u>Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u> <u>For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located.</u> "
3.11.4.1 Working with others	PC1-11794	Support the provision with amendments	AMEND Method 3.11.4.1 to read: "Working with <del>others</del> <u>Waikato and Waipā River Iwi partners and Regional Stakeholders.</u>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			Waikato Regional Council will work with <u>regional</u> stakeholders including..."
3.11.4.2 Certified Industry Scheme	PC1-11795	Support the provision with amendments	AMEND Method 3.11.4.2 to read: "Certified Industry Scheme... b. Oversight, and monitoring of Farm Environment Plans: c. Information <u>provision</u> sharing; d. <del>Aggregate</del> <u>Collective</u> reporting on Certified... e. <u>Process for dealing with non-compliance by the Certified Industry Scheme</u> ; f. <u>Process for dealing with non-compliance by individual members of the Certified Industry Scheme</u> ; <u>and</u> e.g. Consistency across the various Certified Industry Schemes."
3.11.4.3 Farm Environment Plans	PC1-11796	Support the provision with amendments	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation</u> actions to reduce those risks <del>in order</del> to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with <del>more</del> <u>standardised</u> monitoring <u>programme</u> and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on risk assessment and the outcome of previous monitoring results</u> . <u>Waikato Regional Council will prepare an audit schedule for undertaking robust third party audit (independent of the farmer and Certified Farm Environment Planner) and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans."</u>
3.11.4.4 Lakes and Whangamarino Wetland	PC1-11797	Support the provision with amendments	AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working with <del>others</del> <u>stakeholders</u> , will: a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment</u> . <del>a-b.</del> Build on the Shallow Lakes Management Plan by... <del>b-c.</del> Prepare and implement Lake Catchment Plans with community involvement which include : i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community)</u> ."
3.11.4.5 Sub-catchment scale planning	PC1-11798	Support the provision with amendments	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where it <del>has been shown to be required</del> <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently</u> . Sub-catchment planning..."
3.11.4.6 Funding and implementation	PC1-11799	Support the provision	RETAIN Method 3.11.4.6.
3.11.4.7 Information needs to support any future allocation	PC1-11800	Support the provision with amendments	AMEND Method 3.11.4.7 to read: "Gather information and commission... any <del>future</del> framework for the allocation of diffuse discharges <u>by 2026</u> including: a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits <del>in the future</del> ... <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> "
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-11801	Support the provision with amendments	AMEND Method 3.11.4.8 to read: "...b. Use <del>this to inform future</del> <u>the best available information to develop changes to the Waikato Regional Plan by 2026</u> to manage discharges..."

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.4.9 Managing the effects of urban development	PC1-11802	Support the provision with amendments	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built environment <del>which anticipates and addresses</del> <u>to address the cumulative effect of urban development on water quality</u> over the long-term."
3.11.4.10 Accounting system and monitoring	PC1-11803	Support the provision with amendments	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including <del>biological</del> monitoring tools... Community Index and <u>Cultural Health Index</u> to provide the basis for... d. <del>An information</del> <u>A freshwater accounting system that accounts</u> for the diffuse discharges <del>that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges</del> <u>at the enterprise or property scale...</u> "
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-11804	Support the provision with amendments	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. <del>Review and report</del> <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.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-11805	Support the provision	RETAIN Method 3.11.4.12.
3.11.5 Rules	PC1-11807	Support the provision with amendments	AMEND the heading of Rule 3.11.5 to read: "3.11.5 <u>Land Use</u> Rules/Nga Ture."
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-11808	Support the provision	RETAIN Rule 3.11.5.1.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-11809	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> "
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-11810	Support the provision with amendments	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan <del>provided</del> <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 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.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-11811	Support the provision with amendments	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 <del>undertaking</del> <u>implementing and putting in place</u> mitigation actions <u>identified in Farm Environment Plan that will maintain identified low levels of, or reduce the diffuse...</u>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			iii. The actions, timeframes and other... unless other suitable <u>and identified</u> mitigations are... vii. The timeframe and circumstance... Farm Environment Plan <del>shall be</del> amended..."
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-11812	Support the provision	RETAIN Rule 3.11.5.6.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-11813	Support the provision	RETAIN Rule 3.11.5.7.
Schedule A - Registration with Waikato Regional Council	PC1-11814	Support the provision with amendments	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. <u>A map of the property showing all land parcels</u> c. Legal description of the <u>individual land parcels that comprise the property or enterprise</u> as per the certificate(s) of title... 6. Properties that graze livestock must also provide <del>a</del> an <u>additional</u> map showing:... ii. <u>Confirmation of water</u> <del>Water</del> bodies listed in Schedule C (and provided by Waikato Regional Council in a map) for stock exclusion within..."
Schedule B - Nitrogen Reference Point	PC1-11815	Support the provision with amendments	AMEND Schedule B to read: "A property or enterprise with a... b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> <del>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period</del> (specified in clause f)... f. The reference period is <del>an average of the five years between</del> <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> <del>the two financial years covering 2014/2015 and 2015/2016</del> , except for commercial vegetable..." AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions:  <ul style="list-style-type: none"> <li>(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>"</li> </ul> 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> " 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> " 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> " 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> "

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			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> "
Schedule C - Stock exclusion	PC1-11816	Support the provision with amendments	AMEND Schedule C to read: "Water bodies from which cattle... i. Any river that <u>is continually contains surface water flowing (i.e. that is not identified as an intermittently flowing river).</u> ii. Any drain <u>(including farm drain canal)</u> that continually contains surface water. iii. Any wetland, including a constructed wetland <u>that has a direct connection with continuously flowing surface water."</u>
Schedule 1 - Requirements for Farm Environment Plans	PC1-11817	Support the provision with amendments	AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain... 1.c. A list of land parcels which... i. the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) <u>and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</u> iii. <u>The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u> 2. An assessment of the risk of diffuse discharge.. farming activities on the property <u>or enterprise</u> , and the priority of... a. A description of where and how... i. the <u>location and</u> provision of fencing and livestock... ii. for areas with a slope... is impracticable, the <u>location and</u> provision of alternative... c. A description of the critical source areas... i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses <u>from to</u> these areas through... e. A description of nutrient management practices... i. a nutrient budget...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> f. A description of cultivation management... d. <u>Establishing and</u> maintaining appropriate buffers... 3. A spatial risk map(s) at a scale that clearly shows: a. The boundaries of the property <u>or enterprise (if different); and...</u> 4. A <u>detailed</u> description of the <u>following:</u> <u>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> 5. A <u>detailed</u> description of the following: a. <u>Mitigation</u> actions, timeframes and other... 6. A programme of works that sets out: <u>a. The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</u> i. <u>Record of inspection by Waikato Regional Council staff or;</u>



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<ul style="list-style-type: none"> <li>ii. <u>Record of inspection by Certified Industry Scheme staff; and</u></li> <li>iii. <u>Record of audit by independent third party accredited auditor.</u></li> <li>7. <u>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></li> <li>8. <u>A declaration from the Certified Farm Environment Planner confirming the best available and most accurate information was used for the promulgation and design of mitigation actions."</u></li> </ul>
Schedule 2 - Certification of Industry Schemes	PC1-11818	Support the provision with amendments	<p>AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System</p> <p>The application must <u>clearly demonstrate that the...</u></p> <ul style="list-style-type: none"> <li>a. <del>the achievement of</del>the water quality targets referred to...</li> <li>c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u></li> <li>d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u></li> </ul> <p>2. Has an appropriate ownership structure, governance arrangements and management <u>(including capacity and capability to undertake the coordinated management of Farm Management Plans.</u></p> <p>3. <u>Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</u></p> <p>4. <u>Has the appropriate resources to achieve its function and responsibilities under 1(a), including monitoring, auditing and reporting.</u></p> <p>35_ <u>Has documented systems, processes, and...</u></p> <ul style="list-style-type: none"> <li>a. <u>Competent and consistent performance in preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></li> <li>b. <u>Effective internal monitoring of performance, including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></li> <li>c. <u>Robust data management (both spatial and temporal)...</u></li> <li>d. ...</li> <li>e. <u>Timely and appropriate detailed reporting, including (but not limited to):</u> <ul style="list-style-type: none"> <li>i. <u>progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></li> <li>ii. <u>current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></li> </ul> </li> <li>f. <u>Corrective actions will be implemented where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></li> <li>g. <u>Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></li> <li>h. <u>Internal quality control and verification.</u></li> <li>i. <u>The responsibilities and accountability of all parties to the Certified Industry Scheme are clearly stated and enforced...</u></li> <li>j. <u>An accurate and up to date register of scheme membership is established and maintained ...</u></li> </ul>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>k. ...</p> <p>l. The articles of the scheme, <u>including its register of membership</u> are available for public viewing.</p> <p>B. People</p> <p>The application must demonstrate...</p> <p>1. <del>Those</del> <u>The nominated parties responsible for generating and auditing Farm Environment Plans are Certified Farm Environment Planners suitably qualified and experienced.</u></p> <p>2. Auditing of Farm Environment Plans - <u>prepared under the Certified Industry Scheme - requirements</u> will be undertaken by the parties that are accredited auditors and independent of the Farm...</p> <p>c. Farm Environment Plans</p> <p>The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1."</p> <p>Or</p> <p>AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.</p>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-11773	Support the provision with amendments	<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 <i>a</i> 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 bottom of each Freshwater Management Unit.</p>
Additions to Glossary of Terms	PC1-11820	Support the provision with amendments	<p>ADD a NEW definition to read: "<u>Intermittently flowing river: Intermittently flowing river means a river or stream that, in its natural state during an average year, stops flowing on at least one occasion during the year.</u>"</p>
Definition - Enterprise	PC1-11819	Support the provision with amendments	<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>

## Te Aroha Federated Farmers

Submitter ID: 71204

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-2217	Not stated	No specific relief sought for PPC1.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-2215	Support the provision with amendments	AMEND Policy 11 to focus and encourage the entire community to improve and enhance water quality.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-2216	Support the provision with amendments	AMEND Policy 12 to focus and encourage the entire community to improve and enhance water quality.
3.11.4.9 Managing the effects of urban development	PC1-2214	Support the provision with amendments	AMEND Method 3.11.4.9 to focus and encourage the entire community to improve and enhance water quality.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-2210	Oppose the provision	REMOVE the requirement that land over 25 degrees not be available for cultivation or grazing. Rule 3.11.5.2 DELETE the 'Grandparenting' provisions in relation to nutrient discharge.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-2205	Oppose the provision	DELETE in Rule 3.11.5.7 the need to apply for a resource consent to change farming practices/systems.
Schedule B - Nitrogen Reference Point	PC1-2213	Oppose the provision	DELETE the 'Grandparenting' provisions of Schedule B. REMOVE the use of OVERSEER as a tool to assess the Nitrogen Reference Point in Schedule B.
Schedule 1 - Requirements for Farm Environment Plans	PC1-2209	Support the provision	RETAIN Point 2(b)(ii) of Schedule 1.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12535	Oppose the provision	DELETE the 'Grandparenting' provisions of Point 5, Schedule 1.

## Te Awamaarahi Marae Trustees

Submitter ID: 74168

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-10883	Support the provision	Other than the specific decisions sought in this submission, only undertake amendments to Part A, Part B, Part C and Part D of PPC1 where those amendments will: 1. align with this submission's specific submission points; 2. strengthen and enhance PPC1 to achieve the Vision and Strategy; 3. assist in protecting the Values and achieving the Objectives within PPC1; 4. enable flexibility to achieve (and where possible exceed) water quality objectives of the Vision and Strategy earlier than the 80-year timeframe; 5. protect positive gains in achieving or exceeding water quality targets and maintain momentum to further improve water quality; 6. provide for reviews of PPC1 should water quality objectives not be achieved within the given timeframes; 7. provide appropriate support and resourcing to all sectors of the wider community so that the objectives of PPC1; and 8. align with the Waikato-Tainui Environmental Plan 'Tai Tumu, Tai Pari, Tai Ao' and Whakatupuranga 2050.
3.11.2 Objectives	PC1-11958	Support the provision	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units.</u>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1." AND ADD Reasons for adopting Objective 6 to read: " <u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u> "
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-11921	Support the provision with amendments	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..."
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-11925	Support the provision with amendments	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity.</u> "
Objective 3: 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	PC1-11954	Support the provision	RETAIN Objective 3.
Objective 4: People and community resilience	PC1-11955	Support the provision	RETAIN Objective 4.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-11957	Support the provision	RETAIN Objective 5.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-11961	Support the provision	RETAIN Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-11962	Support the provision	RETAIN Policy 2.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-11965	Support the provision	RETAIN Policy 3.
Policy 4: Enabling activities with lower discharges to continue or to be	PC1-11967	Support the provision	RETAIN Policy 4.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
established while signalling further change may be required in future			
Policy 5: Staged approach	PC1-11968	Support the provision	RETAIN Policy 5.
Policy 6: Restricting land use change	PC1-11971	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 <del>generally</del> not be granted. Land use change consent... that demonstrate <del>clear and enduring</del> <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> "
Policy 7: Preparing for allocation in the future	PC1-11972	Support the provision with amendments	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and <del>any</del> future property or... pathogens that <del>will</del> <u>may</u> be required by... that will assist in <del>defining 'land suitability'</del> <u>preparing any new allocation or management regime, ...</u> c. Minimise social disruption and costs in transition to <del>the 'land suitability'</del> any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability <del>will</del> <u>may</u> consider the following criteria:.. c. the natural capacity of the <del>landscape</del> <u>within a sub-catchment</u> to attenuate contaminant loss; and..."
Policy 8: Prioritised implementation	PC1-11975	Support the provision	RETAIN Policy 8.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-11976	Support the provision	RETAIN Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-11979	Support the provision with amendments	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, <del>provide</del> <u>have regard to the continued operation of:</u> a. <del>Continued operation of</del> regionally significant infrastructure'; and b. <del>Continued operation of</del> regionally significant industry'."
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-11980	Support the provision	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects <del>to</del> <u>from</u> point source discharges... Require any person undertaking a point source discharge... effects of the discharge <del>at the time a resource consent application is decided</del> . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to <del>lessen any</del> <u>by offsetting</u> residual adverse effects of the discharge..."
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-11983	Support the provision with amendments	AMEND Policy 12 to read: "Consider the contribution made by a... microbial pathogen <del>catchment</del> loads <u>within a sub-catchment</u> and the impact of that contribution on the <u>likely</u> achievement of the... d. <del>The diminishing return on investment in the treatment plant upgrades in respect of any resultant reduction in nitrogen, phosphorus, sediment or microbial pathogens when treatment plant processes are already achieving a high level of contaminant reduction through the application of the Best Practicable Option*.</del> "
Policy 13: Point sources consent duration	PC1-11984	Support the provision with amendments	AMEND Policy 13 to read: "When determining the... a. <del>A consent term exceeding 25 years, where</del> <u>The applicant demonstrates the approaches...</u> "

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 14: Lakes Freshwater Management Units	PC1-11985	Support the provision with amendments	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-11986	Support the provision	RETAIN Policy 16.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-11987	Support the provision	RETAIN Policy 17.
3.11.4 Implementation methods	PC1-11933	Support the provision with amendments	ADD a NEW Method to read: " <u>3.11.4.13 Decision support system</u> <u>The Waikato Regional Council working with regional stakeholders will:</u> <u>a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u> <u>For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located."</u>
3.11.4.1 Working with others	PC1-11988	Support the provision with amendments	AMEND Method 3.11.4.1 to read: " <u>Working with others Waikato and Waipā River Iwi partners and Regional Stakeholders.</u> Waikato Regional Council will work with <u>regional</u> stakeholders including..."
3.11.4.2 Certified Industry Scheme	PC1-11989	Support the provision with amendments	AMEND Method 3.11.4.2 to read: "Certified Industry Scheme... b. Oversight, and monitoring of Farm Environment Plans: c. Information <u>provisionsharing</u> ; d. <u>AggregateCollective</u> reporting on Certified... e. <u>Process for dealing with non-compliance by the Certified Industry Scheme</u> ; f. <u>Process for dealing with non-compliance by individual members of the Certified Industry Scheme</u> ; <u>and</u> e.g. Consistency across the various Certified Industry Schemes."
3.11.4.3 Farm Environment Plans	PC1-11990	Support the provision with amendments	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation actions</u> to reduce those risks <del>in order</del> to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with <del>more</del> <u>standardised</u> monitoring <u>programme</u> and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on</u> risk assessment <u>and the outcome of previous monitoring results</u> . <u>Waikato Regional Council will prepare an audit schedule for undertaking robust third party audit (independent of the farmer and Certified Farm Environment Planner) and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans."</u>
3.11.4.4 Lakes and Whangamarino Wetland	PC1-11991	Support the provision with amendments	AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working with <del>others</del> <u>stakeholders</u> , will:

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment.</u></p> <p><del>a-b. Build on the Shallow Lakes Management Plan by...</del></p> <p><del>b-c. Prepare and implement Lake Catchment Plans with community involvement which include :</del></p> <p>i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community).</u>"</p>
3.11.4.5 Sub-catchment scale planning	PC1-11992	Support the provision with amendments	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where <del>it has been shown to be required</del> <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently.</u> Sub-catchment planning..."
3.11.4.6 Funding and implementation	PC1-11993	Support the provision	RETAIN Method 3.11.4.6.
3.11.4.7 Information needs to support any future allocation	PC1-11994	Support the provision with amendments	AMEND Method 3.11.4.7 to read: "Gather information and commission... any <del>future</del> framework for the allocation of diffuse discharges <u>by 2026</u> including:
			<p>a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits <del>in the future</del> ...</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>
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-11995	Support the provision with amendments	AMEND Method 3.11.4.8 to read: "...b. Use <del>this to inform future</del> <u>the best available information to develop</u> changes to the Waikato Regional Plan <u>by 2026</u> to manage discharges..."
3.11.4.9 Managing the effects of urban development	PC1-11996	Support the provision with amendments	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built environment <del>which anticipates and addresses</del> <u>to address the cumulative effect of urban development on water quality over the long-term.</u> "
3.11.4.10 Accounting system and monitoring	PC1-11928	Support the provision with amendments	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including <del>biological</del> monitoring tools... Community Index and <u>Cultural Health Index</u> to provide the basis for... d. <del>An information</del> <u>A freshwater accounting system that accounts for the diffuse discharges that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at the enterprise or property scale...</u> "
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-11929	Support the provision with amendments	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. <del>Review and report</del> <u>Report on the progress towards and achievement of the 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.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-11931	Support the provision	RETAIN Method 3.11.4.12.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-11937	Support the provision	RETAIN Rule 3.11.5.1.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-11939	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> "
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-11940	Support the provision with amendments	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan <del>provided</del> <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 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.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-11942	Support the provision with amendments	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 <del>undertaking</del> <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 <del>shall be</del> amended..."
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-11944	Support the provision	RETAIN Rule 3.11.5.6.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-11945	Support the provision	RETAIN Rule 3.11.5.7.
Schedule A - Registration with Waikato Regional Council	PC1-11946	Support the provision with amendments	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. <u>A map of the property showing all land parcels</u> c. Legal description of the <u>individual land parcels that comprise the property or enterprise</u> as per the certificate(s) of title... 6. Properties that graze livestock must also provide <del>a</del> <u>an additional</u> map showing:... ii. <u>Confirmation of water</u> <del>Water</del> bodies listed in Schedule C ( <u>and provided by Waikato Regional Council in a map</u> ) for stock exclusion within..."
Schedule B - Nitrogen Reference Point	PC1-11947	Support the provision with amendments	AMEND Schedule B to read: "A property or enterprise with a... b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> <del>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months)</del> <u>within the reference period</u> (specified in clause f)... f. The reference period is <del>an average of the five years between</del> <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> <del>the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable...</del> "



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<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"> <li>(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>"</li> </ul> <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>" 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>" 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>" 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>" 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>
Schedule C - Stock exclusion	PC1-11948	Support the provision with amendments	<p>AMEND Schedule C to read: "Water bodies from which cattle...</p> <ol style="list-style-type: none"> <li>Any river that <u>is continually contains surface water flowing</u> (i.e. that is not identified as an <u>intermittently flowing river</u>).</li> <li>Any drain (<u>including farm drain canal</u>) that continually contains surface water.</li> <li>Any wetland, including a constructed wetland <u>that has a direct connection with continuously flowing surface water.</u>"</li> </ol>
Schedule 1 - Requirements for Farm Environment Plans	PC1-11949	Support the provision with amendments	<p>AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain...</p> <ol style="list-style-type: none"> <li>A list of land parcels which... <ol style="list-style-type: none"> <li>the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) <u>and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</u></li> <li><u>The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u></li> </ol> </li> <li>An assessment of the risk of diffuse discharge.. farming activities on the property <u>or enterprise</u>, and the priority of... <ol style="list-style-type: none"> <li>A description of where and how... <ol style="list-style-type: none"> <li>the <u>location and</u> provision of fencing and livestock...</li> <li>for areas with a slope... is impracticable, the <u>location and</u> provision of alternative...</li> </ol> </li> <li>A description of the critical source areas... <ol style="list-style-type: none"> <li>the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses <u>from</u> these areas through...</li> </ol> </li> </ol> </li> </ol>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; <u>and</u>  <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:  a. The boundaries of the property <u>or enterprise (if different); and...</u></p> <p>4. A <u>detailed</u> description of the <u>following</u>:  <u>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:  a. <u>Mitigation</u> actions, timeframes and other...</p> <p>6. <u>A programme of works that sets out:</u>  <u>a. The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</u>  i. Record of inspection by Waikato Regional Council staff <u>or;</u>  ii. Record of inspection by Certified Industry Scheme staff; <u>and</u>  iii. Record of audit by independent third party accredited auditor.</p> <p>7. <u>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>8. <u>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>
Schedule 2 - Certification of Industry Schemes	PC1-11950	Support the provision with amendments	<p>AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System  The application must <u>clearly</u> demonstrate that the...</p> <p>a. <del>the achievement of</del> the water quality targets referred to...</p> <p>c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u>  d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u></p> <p>2. Has an appropriate ownership structure, governance arrangements and management (<u>including capacity and capability to undertake the coordinated management of Farm Management Plans.</u></p> <p>3. <u>Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</u></p> <p>4. <u>Has the appropriate resources to achieve its function and responsibilities under 1(a), including monitoring, auditing and reporting.</u></p> <p>35. <u>Has documented systems, processes, and...</u>  a. <u>Competent and consistent performance in preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>b. Effective internal monitoring of performance, <u>including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. Robust data management <u>(both spatial and temporal)</u>...</p> <p>d. ...</p> <p>e. Timely and <del>appropriate</del> <u>detailed</u> reporting, including (but not limited to):</p> <p>i. <u>progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></p> <p>ii. <u>current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></p> <p>f. Corrective actions will be implemented <u>where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></p> <p>g. <u>Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></p> <p>h. Internal quality control <u>and verification.</u></p> <p>i. The responsibilities <u>and accountability</u> of all parties to the Certified Industry Scheme are clearly stated <u>and enforced</u>...</p> <p>j. An accurate and up to date register of scheme membership is <u>established and maintained</u> ...</p> <p>k. ...</p> <p>l. The articles of the scheme, <u>including its register of membership</u> are available for public viewing.</p> <p>B. People The application must demonstrate...</p> <p>1. <del>Those</del> <u>The nominated parties responsible for generating and auditing Farm Environment Plans are Certified Farm Environment Planners suitably qualified and experienced.</u></p> <p>2. Auditing of Farm Environment Plans - <u>prepared under the Certified Industry Scheme - requirements will be undertaken by the parties that are accredited auditors and independent of the Farm...</u></p> <p>c. Farm Environment Plans The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1." Or AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.</p>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-11953	Support the provision with amendments	<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 <i>a</i> for the Waikato River main stem only.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			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.
Additions to Glossary of Terms	PC1-11952	Support the provision with amendments	ADD a NEW definition to read: " <u>Intermittently flowing river: Intermittently flowing river means a river or stream that, in its natural state during an average year, stops flowing on at least one occasion during the year.</u> "
Definition - Enterprise	PC1-11951	Support the provision with amendments	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..."

## Te Kauri Marae

Submitter ID: 74124

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-11294	Support the provision with amendments	Other than the specific decisions sought in this submission, only undertake amendments to Part A, Part B, Part C and Part D of PPC1 where those amendments will: 1. align with this submission's specific submission points; 2. strengthen and enhance PPC1 to achieve the Vision and Strategy; 3. assist in protecting the Values and achieving the Objectives within PPC1; 4. enable flexibility to achieve (and where possible exceed) water quality objectives of the Vision and Strategy earlier than the 80-year timeframe; 5. protect positive gains in achieving or exceeding water quality targets and maintain momentum to further improve water quality; 6. provide for reviews of PPC1 should water quality objectives not be achieved within the given timeframes; 7. provide appropriate support and resourcing to all sectors of the wider community so that the objectives of PPC1; and 8. align with the Waikato-Tainui Environmental Plan 'Tai Tumu, Tai Pari, Tai Ao' and Whakatapuranga 2050.
3.11.2 Objectives	PC1-11626	Support the provision	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units.</u> <u>Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u> " AND ADD Reasons for adopting Objective 6 to read: " <u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u> "
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-11620	Support the provision with amendments	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..."

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-11622	Support the provision with amendments	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being and <u>prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being and <u>prosperity</u> ."
Objective 3: 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	PC1-11623	Support the provision	RETAIN Objective 3.
Objective 4: People and community resilience	PC1-11624	Support the provision	RETAIN Objective 4.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-11625	Support the provision	RETAIN Objective 5.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-11627	Support the provision	RETAIN Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-11628	Support the provision	RETAIN Policy 2.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-11629	Support the provision	RETAIN Policy 3.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-11630	Support the provision	RETAIN Policy 4.
Policy 5: Staged approach	PC1-11631	Support the provision	RETAIN Policy 5.
Policy 6: Restricting land use change	PC1-11632	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 <del>generally</del> not be granted. Land use change consent... that demonstrate <del>clear and enduring</del> <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> "

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 7: Preparing for allocation in the future	PC1-11633	Support the provision with amendments	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and <del>any</del> future property or... pathogens that <del>will</del> <u>may</u> be required by... that will assist in <del>defining 'land suitability'</del> <u>preparing any new allocation or management regime</u> . ... c. Minimise social disruption and costs in transition to the <del>'land suitability'</del> any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability <del>will</del> <u>may</u> consider the following criteria:.. c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."
Policy 8: Prioritised implementation	PC1-11634	Support the provision	RETAIN Policy 8.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-11635	Support the provision	RETAIN Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-11636	Support the provision with amendments	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, <del>provide</del> <u>have regard to the continued operation of:</u> a. <del>Continued operation of</del> regionally significant infrastructure'; and b. <del>Continued operation of</del> regionally significant industry'."
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-11637	Support the provision	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects <del>to</del> <u>from</u> point source discharges... Require any person undertaking a point source discharge... effects of the discharge <del>at the time a resource consent application is decided</del> . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to <del>lessen any</del> <u>by offsetting</u> residual adverse effects of the discharge..."
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-11638	Support the provision with amendments	AMEND Policy 12 to read: "Consider the contribution made by a... microbial pathogen <del>catchment</del> loads <u>within a sub-catchment</u> and the impact of that contribution on the <u>likely</u> achievement of the... <del>d. The diminishing return on investment in the treatment plant upgrades in respect of any resultant reduction in nitrogen, phosphorus, sediment or microbial pathogens when treatment plant processes are already achieving a high level of contaminant reduction through the application of the Best Practicable Option*.</del> "
Policy 13: Point sources consent duration	PC1-11639	Support the provision with amendments	AMEND Policy 13 to read: "When determining the... a. <del>A consent term exceeding 25 years, where</del> <u>The applicant demonstrates the approaches...</u> "
Policy 14: Lakes Freshwater Management Units	PC1-11640	Support the provision with amendments	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-11641	Support the provision	RETAIN Policy 16.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-11642	Support the provision	RETAIN Policy 17.
3.11.4 Implementation methods	PC1-11656	Support the provision with amendments	ADD a NEW Method to read: " <u>3.11.4.13 Decision support system</u> <u>The Waikato Regional Council working with regional stakeholders will:</u>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>a. <u>Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u>  For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a <b>sub-catchment, property and enterprise</b> level - to reducing the diffuse discharge of contaminants within the sub-catchment where <b>property</b> and/or <b>enterprise</b> is located."</p>
3.11.4.1 Working with others	PC1-11643	Support the provision with amendments	<p>AMEND Method 3.11.4.1 to read: "Working with <del>others</del> <u>Waikato and Waipā River Iwi partners and Regional Stakeholders.</u>  Waikato Regional Council will work with <u>regional</u> stakeholders including..."</p>
3.11.4.2 Certified Industry Scheme	PC1-11644	Support the provision with amendments	<p>AMEND Method 3.11.4.2 to read: "Certified Industry Scheme...  b. Oversight, and monitoring of Farm Environment Plans:  c. Information <u>provision</u><del>sharing</del>;  d. <u>Aggregate/Collective</u> reporting on Certified...  e. <u>Process for dealing with non-compliance by the Certified Industry Scheme</u>;  <u>f. Process for dealing with non-compliance by individual members of the Certified Industry Scheme; and</u>  e-g. Consistency across the various Certified Industry Schemes."</p>
3.11.4.3 Farm Environment Plans	PC1-11645	Support the provision with amendments	<p>AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation</u> actions to reduce those risks <del>in order</del> to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,...  Waikato Regional Council will... Farm Environment Plans, starting with <del>more</del> <u>standardised</u> monitoring <u>programme</u> and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on</u> risk assessment <u>and the outcome of previous monitoring results.</u>  <u>Waikato Regional Council will prepare an audit schedule for undertaking</u> robust third party audit (independent of the farmer and Certified Farm Environment Planner) <del>and monitoring of Farm Environment Plans</del> and a randomised method for the selection of Farm Environment Plans."</p>
3.11.4.4 Lakes and Whangamarino Wetland	PC1-11646	Support the provision with amendments	<p>AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working with <del>others</del><u>stakeholders</u>, will:  a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment.</u>  <del>a-b.</del> Build on the Shallow Lakes Management Plan by...  <del>b-c.</del> Prepare and implement Lake Catchment Plans with community involvement which include :  i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community).</u>"</p>
3.11.4.5 Sub-catchment scale planning	PC1-11647	Support the provision with amendments	<p>AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where <del>it has been shown to be required</del> <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently.</u> Sub-catchment planning..."</p>
3.11.4.6 Funding and implementation	PC1-11648	Support the provision	RETAIN Method 3.11.4.6.
3.11.4.7 Information needs to support any future allocation	PC1-11649	Support the provision with amendments	AMEND Method 3.11.4.7 to read: "Gather information and commission... any <del>future</del> framework for the allocation of diffuse discharges <u>by 2026</u> including:

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits <del>in the future</del> ... <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>
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-11650	Support the provision with amendments	AMEND Method 3.11.4.8 to read: "...b. Use <del>this to inform future</del> <u>the best available information to develop</u> changes to the Waikato Regional Plan <u>by 2026</u> to manage discharges..."
3.11.4.9 Managing the effects of urban development	PC1-11651	Support the provision with amendments	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built environment <del>which anticipates and addresses</del> <u>to address the cumulative effect of urban development on water quality</u> over the long-term."
3.11.4.10 Accounting system and monitoring	PC1-11653	Support the provision with amendments	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring network ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including <del>biological</del> monitoring tools... Community Index <u>and Cultural Health Index</u> to provide the basis for... d. <del>An information</del> <u>A freshwater accounting system that accounts</u> for the diffuse discharges <del>that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges</del> <u>at the enterprise or property scale...</u> "
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-11654	Support the provision with amendments	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. <del>Review and report</del> <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</u> <del>targets in 2020 and 2024.</del> " AND DELETE 3.11.4.11 b.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-11655	Support the provision	RETAIN Method 3.11.4.12.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-11658	Support the provision	RETAIN Rule 3.11.5.1.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-11659	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> "
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-11660	Support the provision with amendments	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan <del>provided</del> <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 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.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-11661	Support the provision with amendments	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 <del>undertaking</del> <u>implementing and putting in place</u> mitigation actions <u>identified in Farm Environment Plan that will maintain 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 <del>shall be</del> amended..."
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-11663	Support the provision	RETAIN Rule 3.11.5.7.
Schedule A - Registration with Waikato Regional Council	PC1-11664	Support the provision with amendments	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. <u>A map of the property showing all land parcels</u> c. Legal description of the <u>individual land parcels that comprise the property or enterprise</u> as per the certificate(s) of title... 6. Properties that graze livestock must also provide <del>a</del> <u>an additional</u> map showing:... ii. <u>Confirmation of water</u> <del>Water</del> bodies listed in Schedule C (and provided by Waikato Regional Council in a map) for stock exclusion within..."
Schedule B - Nitrogen Reference Point	PC1-11665	Support the provision with amendments	AMEND Schedule B to read: "A property or enterprise with a... b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> <del>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period</del> (specified in clause f)... f. The reference period is <u>an average of the five years between the five financial years spanning 2011/12 to 2015/16</u> (as consistent with the five year rolling average in 5(a) in Schedule 1) <del>the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable...</del> " AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions: <ul style="list-style-type: none"><li>• (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>"</li></ul> 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> " 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> " 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> "

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>Soil description, second column, "<del>For dairy systems use</del> 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. <u>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>
Schedule C - Stock exclusion	PC1-11666	Support the provision with amendments	<p>AMEND Schedule C to read: "Water bodies from which cattle...</p> <p>i. Any river that <del>is continually contains surface water</del> flowing (i.e. that is not identified as an <u>intermittently flowing river</u>).</p> <p>ii. Any drain (<u>including farm drain canal</u>) that continually contains surface water.</p> <p>iii. Any wetland, including a constructed wetland <u>that has a direct connection with continuously flowing surface water.</u>"</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-11667	Support the provision with amendments	<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) <del>and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</del></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>i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses <del>from</del><u>to</u> these areas through...</p> <p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; <u>and</u></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</u> (if different); and...</p> <p>4. A detailed description of the following:  <u>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 detailed description of the following:</p> <p>a. <u>Mitigation</u> actions, timeframes and other...</p> <p>6. A programme of works that sets out:</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>a. <u>The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</u></p> <ul style="list-style-type: none"> <li><u>i. Record of inspection by Waikato Regional Council staff or;</u></li> <li><u>ii. Record of inspection by Certified Industry Scheme staff; and</u></li> <li><u>iii. Record of audit by independent third party accredited auditor.</u></li> </ul> <p>7. <u>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>8. <u>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>
<p>Schedule 2 - Certification of Industry Schemes</p>	<p>PC1-11668</p>	<p>Support the provision with amendments</p>	<p>AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System The application must <u>clearly</u> demonstrate that the...</p> <ul style="list-style-type: none"> <li><del>a. the achievement of</del>the water quality targets referred to...</li> <li>c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u></li> <li>d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u></li> </ul> <p>2. Has an appropriate ownership structure, governance arrangements and management (<u>including capacity and capability to undertake the coordinated management of Farm Management Plans.</u></p> <p>3. <u>Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</u></p> <p>4. <u>Has the appropriate resources to achieve its function and responsibilities under 1(a), including monitoring, auditing and reporting.</u></p> <p><del>35_</del> Has documented systems, processes, and...</p> <ul style="list-style-type: none"> <li>a. Competent and consistent performance in <u>preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></li> <li>b. Effective internal monitoring of performance, <u>including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></li> <li>c. Robust data management (<u>both spatial and temporal</u>)...</li> <li>d. ...</li> <li>e. Timely and <del>appropriate</del> <u>detailed reporting, including (but not limited to):</u> <ul style="list-style-type: none"> <li><u>i. progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></li> <li><u>ii. current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></li> </ul> </li> <li>f. Corrective actions will be implemented <u>where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></li> <li><u>g. Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></li> <li>h. Internal quality control <u>and verification.</u></li> </ul>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>i. The responsibilities <u>and accountability</u> of all parties to the Certified Industry Scheme are clearly stated <u>and enforced</u>...</p> <p>j. An accurate and up to date register of scheme membership is <u>established and maintained</u> ...</p> <p>k. ...</p> <p>l. The articles of the scheme, <u>including its register of membership</u> are available for public viewing.</p> <p>B. People</p> <p>The application must demonstrate...</p> <p>1. <del>These</del>The nominated parties responsible for generating and auditing Farm Environment Plans are <u>Certified Farm Environment Planners</u> suitably qualified and experienced.</p> <p>2. Auditing of Farm Environment Plans - <u>prepared under the Certified Industry Scheme - requirements</u> will be undertaken by the parties that are accredited auditors and independent of the Farm...</p> <p>c. Farm Environment Plans</p> <p>The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1."</p> <p>Or</p> <p>AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.</p>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-11621	Support the provision with amendments	<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 <i>a</i> 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 bottom of each Freshwater Management Unit.</p>
Additions to Glossary of Terms	PC1-11670	Support the provision with amendments	<p>ADD a NEW definition to read: "<u>Intermittently flowing river: Intermittently flowing river means a river or stream that, in its natural state during an average year, stops flowing on at least one occasion during the year.</u>"</p>
Definition - Enterprise	PC1-11669	Support the provision with amendments	<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>

## Te Mata Group Ltd

Submitter ID: 72978

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4410	Oppose the provision	WITHDRAW PPC1 until the catchment can be considered as one.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-4412	Oppose the provision with amendments	DELETE PPC1 provisions enabling the use of Nitrogen Reference Points and The OVERSEER Model.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12934	Oppose the provision with amendments	Policy 2 - AMEND Farm Environment Plans so they can be developed by farmers in accordance with and supported by Waikato Regional Council guidelines and resources.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12935	Oppose the provision with amendments	AMEND Policy 2 to adopt a methodology that assesses on-farm contaminants and takes into account the terrain, farm policy and receiving environment relevant to the sub-catchment.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-4390	Support the provision with amendments	AMEND Policy 4 stock exclusion provision to reflect the guidelines in the Clean Water document AND AMEND to ensure that assessment of compliance is tailored to the farm, and mitigations in Farm Environment Plans are tailored to the farm.
Policy 6: Restricting land use change	PC1-4418	Oppose the provision	DELETE Policy 6.
Policy 7: Preparing for allocation in the future	PC1-4414	Oppose the provision	DELETE provisions enabling the use of Nitrogen Reference Points and The OVERSEER Model. Policy 7 AND AMEND to adopt a methodology that assesses on-farm contaminants and takes into account the terrain, farm policy and receiving environment relevant to the sub-catchment.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-4409	Oppose the provision	DELETE Policy 16.
3.11.4.5 Sub-catchment scale planning	PC1-4417	Support the provision	DELETE PPC1 in order to collect data on the contaminants affecting water quality in each sub-catchment.
3.11.5 Rules	PC1-4415	Oppose the provision with amendments	DELETE (Rules 3.11.5) provisions enabling the use of Nitrogen Reference Points and The OVERSEER Model. AND AMEND to adopt a methodology that assesses on-farm contaminants and takes into account the terrain, farm policy and receiving environment relevant to the sub-catchment. AND AMEND Farm Environment Plans so they can be developed by farmers in accordance with and supported by Waikato Regional Council guidelines and resources.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-4402	Support the provision with amendments	AMEND Rule 3.11.5.1 stock exclusion provision to reflect the guidelines in the Clean Water document. AND AMEND to ensure that assessment of compliance is tailored to the farm, and mitigations in Farm Environment Plans are tailored to the farm.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-4404	Support the provision with amendments	AMEND Rule 3.11.5.2 stock exclusion provision to reflect the guidelines in the Clean Water document. AND AMEND to ensure that assessment of compliance is tailored to the farm, and mitigations in Farm Environment Plans are tailored to the farm.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-4405	Support the provision with amendments	AMEND Rule 3.11.5.3 stock exclusion provision to reflect the guidelines in the Clean Water document. AND AMEND to ensure that assessment of compliance is tailored to the farm, and mitigations in Farm Environment Plans are tailored to the farm.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-4406	Support the provision with amendments	AMEND Rule 3.11.5.4 stock exclusion provision to reflect the guidelines in the Clean Water document. AND AMEND to ensure that assessment of compliance is tailored to the farm, and mitigations in Farm Environment Plans are tailored to the farm.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-4419	Oppose the provision	DELETE Rule 3.11.5.7.
Schedule B - Nitrogen Reference Point	PC1-4416	Oppose the provision	DELETE from Schedule B provisions enabling the use of Nitrogen Reference Points and The OVERSEER Model. AND AMEND to adopt a methodology that assesses on-farm contaminants and takes into account the terrain, farm policy and receiving environment relevant to the sub-catchment.
Schedule C - Stock exclusion	PC1-4407	Support the provision with amendments	AMEND Schedule C stock exclusion provision to reflect the guidelines in the Clean Water document. AND AMEND to ensure that assessment of compliance is tailored to the farm, and mitigations in Farm Environment Plans are tailored to the farm.

## Te Miro Farms Partnership

Submitter ID: 72893

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6869	Oppose the provision	WITHDRAW PPC1 until the lower catchment is reinstated and then notify as a whole.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-6879	Support the provision with amendments	RETAIN the intent of Objective 1. AND AMEND Table 3.11-1 so the water quality targets provide for the ecological health, and cultural values of water bodies, as well as the social and economic well-being of people and communities. AND AMEND Table 3.11-1 so the numerical targets do not apply during flood events or when they are unlikely to be used.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-6885	Support the provision with amendments	AMEND Objective 2 to strengthen it to provide for the long-term social, economic, and cultural well-being of the Waikato Waipā communities. AND to maintain the economic resilience, sustainability, and vitality, of people and communities.
Objective 4: People and community resilience	PC1-6891	Support the provision with amendments	AMEND Objective 4 so it provides for people and community resilience over the life of the plan.  AND DELETE numerical freshwater objectives if they are not achievable. AND AMEND PPC1 to clearly set out how the required outcomes at year 80 will be reached. AND DELETE Objective 4b.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND DELETE any reference to the staged approach and future plan changes, including increasing stringency in land use control and requirements.</p> <p>AND ADD a NEW Objective 4b which will provide for community and individual resilience through a community lead sub-catchment approach which will allow people to adapt their management processes and gives them ownership over solving the issues and achievements.</p>
<p>Policy 2: Tailored approach to reducing diffuse discharges from farming activities</p>	<p>PC1-12936</p>	<p>Support the provision with amendments</p>	<p>AMEND PPC1 so properties are not required to be held at or below their Nitrogen Reference Point.</p>
<p>Policy 2: Tailored approach to reducing diffuse discharges from farming activities</p>	<p>PC1-12937</p>	<p>Support the provision with amendments</p>	<p>PUT ON HOLD the implementation of PPC1 until the scientific data around which contaminants are causing water quality decline is available for each sub-catchment.</p>
<p>Policy 2: Tailored approach to reducing diffuse discharges from farming activities</p>	<p>PC1-6928</p>	<p>Support the provision with amendments</p>	<p>AMEND PPC1 so that Farm Environment Plans allow for mitigation against contaminants and do not include prescriptive blanket measures</p> <p>AND AMEND PPC1 so that the timeframes are extend to enable compliance with the Farm Environment Plan provisions.</p>
<p>Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems</p>	<p>PC1-6931</p>	<p>Support the provision with amendments</p>	<p>Policy 3: AMEND PPC1 to change the definition of a waterway to that of the National Water Accord.</p> <p>AND AMEND PPC1 to change the slope requirements to 15 degrees in accordance with the National Water Accord.</p> <p>AND AMEND to extend the stock exclusion timelines and give certainty to those with land classed as 6+ that it will not be converted to forestry in future plan changes.</p> <p>AND AMEND PPC1 to allow the individual Farm Environment Plan to identify mitigation approaches against contaminants, relevant to each farm, rather than a blanket approach.</p> <p>AND AMEND PPC1 to base the necessity of fencing of waterbodies on their current level of contamination, stocking rate and the proven impact of fencing.</p> <p>AND AMEND PPC1 to enable stock to enter waterbodies if they are being actively managed and the waterbody is not crossed by stock more than 3 times per week.</p> <p>AND AMEND to include provisions that any waterway fencing be subsidised by the Waikato Regional Council.</p>
<p>Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future</p>	<p>PC1-6932</p>	<p>Support the provision with amendments</p>	<p>AMEND PPC1 to change the definition of a waterway to that of the National Water Accord.</p> <p>AND AMEND PPC1 to change the slope requirements to 15 degrees in accordance with the National Water Accord.</p> <p>AND AMEND to extend the stock exclusion timelines and give certainty to those with land classed as 6+ that it will not be converted to forestry in future plan changes.</p> <p>AND AMEND PPC1 to allow the individual Farm Environment Plan to identify mitigation approaches against contaminants, relevant to each farm, rather than a blanket approach.</p> <p>AND AMEND PPC1 to base the necessity of fencing of waterbodies on their current level of contamination, stocking rate and the proven impact of fencing.</p>

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			<p>AND AMEND PPC1 to enable stock to enter waterbodies if they are being actively managed and the waterbody is not crossed by stock more than 3 times per week.                      AND AMEND to include provisions that any waterway fencing be subsidised by the Waikato Regional Council.</p>
Policy 6: Restricting land use change	PC1-6902	Oppose the provision	DELETE Policy 6.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-6849	Oppose the provision	DELETE Policy 16.
3.11.4.5 Sub-catchment scale planning	PC1-6872	Support the provision	RETAIN Method 3.11.5.4 but do not implement PPC1 until the scientific data around which contaminants are causing water quality decline is available for each sub-catchment.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-6925	Oppose the provision	<p>AMEND PPC1 to change the definition of a waterway to that of the National Water Accord.                      AND AMEND PPC1 to change the slope requirements to 15 degrees in accordance with the National Water Accord.</p> <p>AND AMEND to extend the stock exclusion timelines and give certainty to those with land classed as 6+ that it will not be converted to forestry in future plan changes.</p> <p>AND AMEND PPC1 to allow the individual Farm Environment Plan to identify mitigation approaches against contaminants, relevant to each farm, rather than a blanket approach.                      AND AMEND PPC1 to base the necessity of fencing of waterbodies on their current level of contamination, stocking rate and the proven impact of fencing.                      AND AMEND PPC1 to enable stock to enter waterbodies if they are being actively managed and the waterbody is not crossed by stock more than 3 times per week.                      AND AMEND to include provisions that any waterway fencing be subsidised by the Waikato Regional Council.                      AND AMEND PPC1 so that Farm Environment Plans allow for mitigation against contaminants and do not include prescriptive blanket measures.                      AND AMEND PPC1 so properties are not required to be held at or below their Nitrogen Reference Point.                      AND AMEND PPC1 so that the timeframes are extend to enable compliance with the Farm Environment Plan provisions.</p> <p>PUT ON HOLD the implementation of PPC1 until the scientific data around which contaminants are causing water quality decline is available for each sub-catchment.</p>
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-6916	Oppose the provision	<p>DELETE the use of the Nitrogen Reference Point and the use of the OVERSEER Model from PPC1                      AND AMEND PPC1 to use a sub-catchment approach to address contaminants that are relevant to each farm. AND use Farm Environment Plans to determine the best scenario for each farm, and science to determine which contaminants are an issue in each sub-catchment. AND AMEND the rules so that they are not based on holding land use to historic leaching rates; stocking rates; and land uses</p>



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND PPC1 to change the definition of a waterway to that of the National Water Accord            AND AMEND PPC1 to change the slope requirements to 15 degrees in accordance with the National Water Accord</p> <p>AND AMEND to extend the stock exclusion timelines and give certainty to those with land classed as 6+ that it will not be converted to forestry in future plan changes</p> <p>AND AMEND PPC1 to allow the individual Farm Environment Plan to identify mitigation approaches against contaminants, relevant to each farm, rather than a blanket approach            AND AMEND PPC1 to base the necessity of fencing of waterbodies on their current level of contamination, stocking rate and the proven impact of fencing            AND AMEND PPC1 to enable stock to enter waterbodies if they are being actively managed and the waterbody is not crossed by stock more than 3 times per week            AND AMEND to include provisions that any waterway fencing be subsidised by the Waikato Regional Council            AND AMEND PPC1 so that Farm Environment Plans allow for mitigation against contaminants and do not include prescriptive blanket measures            AND AMEND PPC1 so properties are not required to be held at or below their Nitrogen Reference Point            AND AMEND PPC1 so that the timeframes are extend to enable compliance with the Farm Environment Plan provisions</p> <p>AND PUT ON HOLD the implementation of PPC1 until the scientific data around which contaminants are causing water quality decline is available for each sub-catchment.</p>
<p>3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme</p>	<p>PC1-6922</p>	<p>Oppose the provision</p>	<p>DELETE the use of the Nitrogen Reference Point and the use of the OVERSEER Model from PPC1            AND AMEND PPC1 to use a sub-catchment approach to address contaminants that are relevant to each farm. AND use Farm Environment Plans to determine the best scenario for each farm, and science to determine which contaminants are an issue in each sub-catchment. AND AMEND the rules so that they are not based on holding land use to historic leaching rates; stocking rates; and land uses            AND AMEND PPC1 to change the definition of a waterway to that of the National Water Accord            AND AMEND PPC1 to change the slope requirements to 15 degrees in accordance with the National Water Accord</p> <p>AND EXTEND the stock exclusion timelines and give certainty to those with land classed as 6+ that it will not be converted to forestry in future plan changes</p> <p>AND AMEND PPC1 to allow the individual Farm Environment Plan to identify mitigation approaches against contaminants, relevant to each farm, rather than a blanket approach            AND AMEND PPC1 to base the necessity of fencing of waterbodies on their current level of contamination, stocking rate and the proven impact of fencing</p>

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			<p>AND AMEND PPC1 to enable stock to enter waterbodies if they are being actively managed and the waterbody is not crossed by stock more than 3 times per week                      AND AMEND to include provisions that any waterway fencing be subsidised by the Waikato Regional Council                      AND AMEND PPC1 so that Farm Environment Plans allow for mitigation against contaminants and do not include prescriptive blanket measures                      AND AMEND PPC1 so properties are not required to be held at or below their Nitrogen Reference Point                      AND AMEND PPC1 so that the timeframes are extend to enable compliance with the Farm Environment Plan provisions</p> <p>AND PUT ON HOLD the implementation of PPC1 until the scientific data around which contaminants are causing water quality decline is available for each sub-catchment                      AND AMEND Rule 3.11.5.3 so, if a Farm Environment Plan is supplied it should be a permitted activity, not a consented one, regardless of the presence of a certified industry scheme.</p>
<p>3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme</p>	<p>PC1-6924</p>	<p>Oppose the provision</p>	<p>DELETE the use of the Nitrogen Reference Point and the use of the OVERSEER Model from PPC1                      AND AMEND PPC1 to use a sub-catchment approach to address contaminants that are relevant to each farm. AND use Farm Environment Plans to determine the best scenario for each farm, and science to determine which contaminants are an issue in each sub-catchment. AND AMEND the rules so that they are not based on holding land use to historic leaching rates; stocking rates; and land uses                      AND AMEND PPC1 to change the definition of a waterway to that of the National Water Accord                      AND AMEND PPC1 to change the slope requirements to 15 degrees in accordance with the National Water Accord</p> <p>AND AMEND to extend the stock exclusion timelines and give certainty to those with land classed as 6+ that it will not be converted to forestry in future plan changes</p> <p>AND AMEND PPC1 to allow the individual Farm Environment Plan to identify mitigation approaches against contaminants, relevant to each farm, rather than a blanket approach                      AND AMEND PPC1 to base the necessity of fencing of waterbodies on their current level of contamination, stocking rate and the proven impact of fencing                      AND AMEND PPC1 to enable stock to enter waterbodies if they are being actively managed and the waterbody is not crossed by stock more than 3 times per week                      AND AMEND to include provisions that any waterway fencing be subsidised by the Waikato Regional Council                      AND AMEND PPC1 so that Farm Environment Plans allow for mitigation against contaminants and do not include prescriptive blanket measures                      AND AMEND PPC1 so properties are not required to be held at or below their Nitrogen Reference Point.                      AND AMEND PPC1 so that the timeframes are extend to enable compliance with the Farm Environment Plan provisions.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND PUT ON HOLD the implementation of PPC1 until the scientific data around which contaminants are causing water quality decline is available for each sub-catchment.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-6926	Support the provision with amendments	<p>DELETE the use of the Nitrogen Reference Point and the use of the OVERSEER Model from PPC1 AND AMEND PPC1 to use a sub-catchment approach to address contaminants that are relevant to each farm. Use Farm Environment Plans to determine the best scenario for each farm, and science to determine which contaminants are an issue in each sub-catchment. AMEND the rules so that they are not based on holding land use to historic leaching rates; stocking rates; and land uses</p> <p>AND AMEND PPC1 so that Farm Environment Plans allow for mitigation against contaminants and do not include prescriptive blanket measures AND AMEND PPC1 so properties are not required to be held at or below their Nitrogen Reference Point AND AMEND PPC1 so that the timeframes are extend to enable compliance with the Farm Environment Plan provisions</p> <p>AND PUT ON HOLD the implementation of PPC1 until the scientific data around which contaminants are causing water quality decline is available for each sub-catchment.</p>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13111	Support the provision with amendments	<p>AMEND PPC1 so that Farm Environment Plans allow for mitigation against contaminants and do not include prescriptive blanket measures AND AMEND PPC1 so that the timeframes are extend to enable compliance with the Farm Environment Plan provisions.</p>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13112	Support the provision with amendments	<p>AMEND PPC1 to use a sub-catchment approach to address contaminants that are relevant to each farm. AND use Farm Environment Plans to determine the best scenario for each farm, and science to determine which contaminants are an issue in each sub-catchment. AND AMEND the rules so that they are not based on holding land use to historic leaching rates; stocking rates; and land uses AND PUT ON HOLD the implementation of PPC1 until the scientific data around which contaminants are causing water quality decline is available for each sub-catchment.</p>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-6927	Oppose the provision with amendments	<p>DELETE the use of the Nitrogen Reference Point and the use of the OVERSEER Model from PPC1 AND AMEND PPC1 so properties are not required to be held at or below their Nitrogen Reference Point.</p>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-6909	Oppose the provision	<p>DELETE Rule 3.11.5.7 AND DELETE the use of the Nitrogen Reference Point and the use of OVERSEER from PPC1 AND AMEND PPC1 to use a sub-catchment approach to address contaminants that are relevant to each farm. And use Farm Environment Plans to determine the best scenario for each farm, and science to determine which contaminants are an issue in each sub-catchment. AND AMEND the rules so that they are not based on holding land use to historic leaching rates; stocking rates; and land uses AND AMEND PPC1 so that Farm Environment Plans allow for mitigation against contaminants and do not include prescriptive blanket measures</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND PPC1 so properties are not required to be held at or below their Nitrogen Reference Point</p> <p>AND AMEND PPC1 so that the timeframes are extend to enable compliance with the Farm Environment Plan provisions</p> <p>AND PUT ON HOLD the implementation of PPC1 until the scientific data around which contaminants are causing water quality decline is available for each sub-catchment.</p>
Schedule B - Nitrogen Reference Point	PC1-6917	Oppose the provision	<p>DELETE the use of the Nitrogen Reference Point and the use of the OVERSEER Model from PPC1.</p> <p>AND AMEND PPC1 to use a sub-catchment approach to address contaminants that are relevant to each farm. AND use Farm Environment Plans to determine the best scenario for each farm, and science to determine which contaminants are an issue in each sub-catchment. AND AMEND the rules so that they are not based on holding land use to historic leaching rates; stocking rates; and land uses.</p>
Schedule C - Stock exclusion	PC1-6933	Support the provision with amendments	<p>AMEND PPC1 to change the definition of a waterway to that of the National Water Accord.</p> <p>AND AMEND PPC1 to change the slope requirements to 15 degrees in accordance with the National Water Accord.</p> <p>AND AMEND to extend the stock exclusion timelines and give certainty to those with land classed as 6+ that it will not be converted to forestry in future plan changes.</p> <p>AND AMEND PPC1 to allow the individual Farm Environment Plan to identify mitigation approaches against contaminants, relevant to each farm, rather than a blanket approach.</p> <p>AND AMEND PPC1 to base the necessity of fencing of waterbodies on their current level of contamination, stocking rate and the proven impact of fencing.</p> <p>AND AMEND PPC1 to enable stock to enter waterbodies if they are being actively managed and the waterbody is not crossed by stock more than 3 times per week.</p> <p>AND AMEND to include provisions that any waterway fencing be subsidised by the Waikato Regional Council.</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12536	Support the provision with amendments	AMEND PPC1 so properties are not required to be held at or below their Nitrogen Reference Point.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12537	Support the provision with amendments	PUT ON HOLD the implementation of PPC1 until the scientific data around which contaminants are causing water quality decline is available for each sub-catchment.
Schedule 1 - Requirements for Farm Environment Plans	PC1-6930	Support the provision with amendments	<p>AMEND PPC1 so that Farm Environment Plans allow for mitigation against contaminants and do not include prescriptive blanket measures</p> <p>AND AMEND PPC1 so that the timeframes are extend to enable compliance with the Farm Environment Plan provisions.</p>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-6884	Support the provision with amendments	<p>AMEND Table 3.11-1 so that the water quality targets are achievable.</p> <p>AMEND Table 3.11-1 so the water quality targets provide for the ecological health, and cultural values of water bodies, as well as the social and economic well-being of people and communities.</p> <p>AND AMEND Table 3.11-1 so the numerical targets do not apply during flood events or when they are unlikely to be used, eg during winter months.</p>

## Templeton, Heather and Murray

Submitter ID: 71219

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-2525	Oppose the provision	DELETE Policy 1 OR make better use of Farm Environment Plans to determine land use capability and as a measure of nutrient allocation.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12659	Oppose the provision	DELETE Policy 1 OR make better use of Farm Environment Plans to determine land use capability and as a measure of nutrient allocation.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-2157	Oppose the provision	DELETE Point (c) from Policy 2 OR make better use of Farm Environment Plans to determine land use capability and as a measure of nutrient allocation.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-1735	Oppose the provision	DELETE Point (c) from Policy 3 OR make better use of Farm Environment Plans to determine land use capability and as a measure of nutrient allocation.
3.11.4.3 Farm Environment Plans	PC1-1710	Support the provision with amendments	AMEND Method 3.11.4.3 so that Farm Environment Plans focus on current and future management practices. AND AMEND the time-frames for the development of Farm Environment Plans to reflect the lack of qualified Farm Environmental Planners.
Schedule B - Nitrogen Reference Point	PC1-1725	Oppose the provision	DELETE Schedule B OR MAKE better use of Farm Environment Plans to determine land use capability and as a measure of nutrient allocation.
Schedule C - Stock exclusion	PC1-1717	Oppose the provision with amendments	DELETE Schedule C and REPLACE with the provisions in the National Water Accord, ie that slopes up to 15 degrees be fenced and a revised definition of 'water body' be adopted.

## Templeton, Jennifer Joy & Ian Robert

Submitter ID: 71256

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule C - Stock exclusion	PC1-357	Oppose the provision	AMEND Schedule C to be the same as the National Water Accord Standards (i.e. Streams 1 metre wide and 300mls deep) and make any consequential amendments .

## Te Paiaka Lands Trust

Submitter ID: 72690

Notified PPC1 Summary of Decisions Requested Report by Submitter – Volume 4 S-Z (#12893012)

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8908	Oppose the provision	PUT PPC1 ON HOLD until such a time that all and any part of the catchment implicated by PPC1 is included.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-8909	Oppose the provision	CONSIDER the implications of stock exclusion AND AMEND Rule 3.11.5.1 to ensure that fencing is linked to land use intensity and fencing is prioritised AND CONSIDER alternative solutions on steer land, such as water reticulation AND CONSIDER matching land use capability rather than directly to slope AND AMEND to ensure an industry-wide capability assessment is undertaken to assess who will complete Farm Environment Plans AND demonstrate how Farm Environment Plans are to be prepared and how the gains will be quantified AND CLARIFY how monitoring of Farm Environment Plans will be undertaken and who bears the cost.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-8910	Oppose the provision	CONSIDER the implications of stock exclusion AND AMEND Rule 3.11.5.2 to ensure that fencing is linked to land use intensity and fencing is prioritised AND CONSIDER alternative solutions on steer land, such as water reticulation AND CONSIDER matching land use capability rather than directly to slope AND AMEND to ensure an industry-wide capability assessment is undertaken to assess who will complete Farm Environment Plans AND demonstrate how Farm Environment Plans are to be prepared and how the gains will be quantified AND CLARIFY how monitoring of Farm Environment Plans will be undertaken and who bears the cost AND CONSIDER long-term averaging of nitrogen losses AND CONSIDER alternative tools such as the natural capital approach AND AMEND Rule 3.11.5.2 to ensure tools such as MENU's are more widely utilised AND AMEND Rule 3.11.5.2 to ensure that OVERSEER Model calculations are used as a guide only, and to focus on trends.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-8911	Oppose the provision	CONSIDER the implications of stock exclusion AND AMEND Rule 3.11.5.3 to ensure that fencing is linked to land use intensity and fencing is prioritised AND CONSIDER alternative solutions on steer land, such as water reticulation AND CONSIDER matching land use capability rather than directly to slope AND AMEND to ensure an industry-wide capability assessment is undertaken to assess who will complete Farm Environment Plans AND demonstrate how Farm Environment Plans are to be prepared and how the gains will be quantified AND CLARIFY how monitoring of Farm Environment Plans will be undertaken and who bears the cost AND CONSIDER long-term averaging of nitrogen losses AND CONSIDER alternative tools such as the natural capital approach

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND Rule 3.11.5.3 to ensure tools such as MENU's are more widely utilised AND AMEND Rule 3.11.5.3 to ensure that OVERSEER Model calculations are used as a guide only, and to focus on trends.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-8912	Oppose the provision	CONSIDER the implications of stock exclusion AND AMEND Rule 3.11.5.4 to ensure that fencing is linked to land use intensity and fencing is prioritised AND CONSIDER alternative solutions on steer land, such as water reticulation AND CONSIDER matching land use capability rather than directly to slope AND AMEND to ensure an industry-wide capability assessment is undertaken to assess who will complete Farm Environment Plans AND demonstrate how Farm Environment Plans are to be prepared and how the gains will be quantified AND CLARIFY how monitoring of Farm Environment Plans will be undertaken and who bears the cost AND CONSIDER long-term averaging of nitrogen losses AND CONSIDER alternative tools such as the natural capital approach AND AMEND Rule 3.11.5.4 to ensure tools such as MENU's are more widely utilised AND AMEND Rule 3.11.5.4 to ensure that OVERSEER Model calculations are used as a guide only, and to focus on trends.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-8913	Oppose the provision	AMEND to ensure an industry-wide capability assessment is undertaken to assess who will complete Farm Environment Plans AND demonstrate how Farm Environment Plans are to be prepared and how the gains will be quantified AND CLARIFY how monitoring of Farm Environment Plans will be undertaken and who bears the cost AND CONSIDER long-term averaging of nitrogen losses AND CONSIDER alternative tools such as the natural capital approach AND AMEND Rule 3.11.5.5 to ensure tools such as MENU's are more widely utilised AND AMEND Rule 3.11.5.5 to ensure that OVERSEER Model calculations are used as a guide only, and to focus on trends.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-8915	Oppose the provision	AMEND Rule 3.11.5.6 to ensure an industry-wide capability assessment is undertaken to assess who will complete Farm Environment Plans AND demonstrate how Farm Environment Plans are to be prepared and how the gains will be quantified AND CLARIFY how monitoring of Farm Environment Plans will be undertaken and who bears the cost.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13113	Oppose the provision	Rule 3.11.5.6 - CONSIDER long-term averaging of nitrogen losses AND CONSIDER alternative tools such as the natural capital approach AND AMEND Rule 3.11.5.6 to ensure tools such as MENU's are more widely utilised AND AMEND Rule 3.11.5.6 to ensure that OVERSEER Model calculations are used as a guide only, and to focus on trends.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13114	Oppose the provision	AMEND Rule 3.11.5.6 to ensure a consistent approach to timeframes and contents of consents.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-8916	Oppose the provision	AMEND Rule 3.11.5.7 to remove the broad brush approach to limiting land use change AND AMEND to adopt a best practice approach to managing losses rather than limiting land use change altogether AND AMEND to ensure an industry-wide capability assessment is undertaken to assess who will complete Farm Environment Plans and demonstrate how Farm Environment Plans are to be prepared and how the gains will be quantified AND CLARIFY how monitoring of Farm Environment Plans will be undertaken and who bears the cost AND CONSIDER long-term averaging of nitrogen losses AND CONSIDER alternative tools such as the natural capital approach AND AMEND Rule 3.11.5.7 to ensure tools such as MENU's are more widely utilised AND AMEND Rule 3.11.5.7 to ensure that OVERSEER Model calculations are used as a guide only, and to focus on trends.
Schedule B - Nitrogen Reference Point	PC1-8918	Oppose the provision	CONSIDER long-term averaging of nitrogen losses CONSIDER alternative tools such as the natural capital approach AND AMEND Schedule B to ensure tools such as MENU's are more widely utilised AND AMEND Schedule B to ensure that OVERSEER Model calculations are used as a guide only, and to focus on trends.
Schedule C - Stock exclusion	PC1-8914	Oppose the provision	CONSIDER the implications of stock exclusion AND AMEND Schedule C to ensure that fencing is linked to land use intensity and fencing is prioritised AND CONSIDER alternative solutions on steep land, such as water reticulation AND CONSIDER matching land use capability rather than directly to slope.
Schedule 1 - Requirements for Farm Environment Plans	PC1-8917	Oppose the provision	AMEND Schedule 1 to ensure an industry-wide capability assessment is undertaken to assess who will complete Farm Environment Plans and demonstrate how Farm Environment Plans are to be prepared and how the gains will be quantified AND CLARIFY how monitoring of Farm Environment Plans will be undertaken and who bears the cost.

## TerraCare Fertilisers Limited

Submitter ID: 73066

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-10491	Support the provision with amendments	AMEND PPC1 to ensure the OVERSEER Model is used as a direction not as a method of regulation AND AMEND to support field research and information dissemination into alternative forms of phosphate other than superphosphate.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-10499	Oppose the provision with amendments	AMEND Policy 2(c) to ensure best management practices and objectives are set instead of a definitive point AND AMEND to provide incentives for nutrient loss mitigation rather than punitive measures.
Policy 7: Preparing for allocation in the future	PC1-10498	Oppose the provision with amendments	AMEND Policy 7 (d) to ensure a phosphate range in soil is readily measureable AND AMEND to provide for a more certain indication of potential for contamination than nitrate leaching in the OVERSEER Model AND AMEND to provide for the creation of an independent body to assess research on a value based basis and that funding and information dissemination be assigned on that basis.
Schedule B - Nitrogen Reference Point	PC1-10493	Oppose the provision with amendments	AMEND Schedule B to support science which provides viable alternatives to superphosphate AND collate all data regarding solubility and factor into the OVERSEER Model or any other tool used to more accurately assess the nutrient output of an enterprise AND CLARIFY the meaning of the outputs in relation to risk of freshwater contamination AND AMEND to use Overseer as a guide to best management practices not a regulatory tool AND publish Overseer so it can be peer reviewed by other modellers AND MAKE the peer review commentary publicly available if this has been conducted AND NOTIFY what the inherent errors are within the model.
Schedule 1 - Requirements for Farm Environment Plans	PC1-10494	Support the provision with amendments	AMEND Schedule 1 to emphasise the importance of potential mitigating factors around phosphorus contamination AND AMEND to ensure those giving advice on this topic are fully cognisant of the properties of different phosphate forms.

## Terry, Shaun and Catherine

Submitter ID: 73037

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-5984	Support the provision with amendments	AMEND Schedule B to provide for a 6 year reset of the Nitrogen Reference Point to be used for succession, or on purchasing a new farm, provided it is under the 60th percentile.

## Te Runanga o Ngati Kea Ngati Tuara Trust

Submitter ID: 73543

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.2 Objectives	PC1-12235	Support the provision	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units.</u> <u>Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u> "

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND ADD Reasons for adopting Objective 6 to read: " <u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u> "
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-12229	Support the provision with amendments	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..."
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-12230	Support the provision with amendments	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity.</u> "
Objective 3: 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	PC1-12232	Support the provision	RETAIN Objective 3.
Objective 4: People and community resilience	PC1-12233	Support the provision	RETAIN Objective 4.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-12234	Support the provision	RETAIN Objective 5.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12236	Support the provision	RETAIN Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12237	Support the provision	RETAIN Policy 2.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-12239	Support the provision	RETAIN Policy 3.
Policy 4: Enabling activities with lower discharges to continue or to be	PC1-12240	Support the provision	RETAIN Policy 4.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
established while signalling further change may be required in future			
Policy 5: Staged approach	PC1-12242	Support the provision	RETAIN Policy 5.
Policy 6: Restricting land use change	PC1-12243	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 <del>generally</del> not be granted. Land use change consent... that demonstrate <del>clear and enduring</del> <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> "
Policy 7: Preparing for allocation in the future	PC1-12244	Support the provision with amendments	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and <del>any</del> future property or... pathogens that <del>will</del> <u>may</u> be required by... that will assist in <del>defining 'land suitability'</del> <u>preparing any new allocation or management regime, ...</u> c. Minimise social disruption and costs in transition to <del>the 'land suitability'</del> any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability <del>will</del> <u>may</u> consider the following criteria:.. c. the natural capacity of the <del>landscape</del> <u>within a sub-catchment</u> to attenuate contaminant loss; and..."
Policy 8: Prioritised implementation	PC1-12245	Support the provision	RETAIN Policy 8.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-12246	Support the provision	RETAIN Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-12248	Support the provision with amendments	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, <del>provide</del> <u>have regard to the continued operation of:</u> a. <del>Continued operation of</del> regionally significant infrastructure'; and b. <del>Continued operation of</del> regionally significant industry'."
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-12249	Support the provision	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects <del>to</del> <u>from</u> point source discharges... Require any person undertaking a point source discharge... effects of the discharge <del>at the time a resource consent application is decided</del> . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to <del>lessen any</del> <u>by offsetting</u> residual adverse effects of the discharge..."
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-12250	Support the provision with amendments	AMEND Policy 12 to read: "Consider the contribution made by a... microbial pathogen <del>catchment</del> loads <u>within a sub-catchment</u> and the impact of that contribution on the <del>likely</del> achievement of the... d. <del>The diminishing return on investment in the treatment plant upgrades in respect of any resultant reduction in nitrogen, phosphorus, sediment or microbial pathogens when treatment plant processes are already achieving a high level of contaminant reduction through the application of the Best Practicable Option*.</del> "
Policy 13: Point sources consent duration	PC1-12251	Support the provision with amendments	AMEND Policy 13 to read: "When determining the... a. <del>A consent term exceeding 25 years, where</del> <u>The applicant demonstrates the approaches...</u> "

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 14: Lakes Freshwater Management Units	PC1-12252	Support the provision with amendments	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-12253	Support the provision	RETAIN Policy 16.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-12254	Support the provision	RETAIN Policy 17.
3.11.4 Implementation methods	PC1-12272	Support the provision with amendments	ADD a NEW Method to read: " <u>3.11.4.13 Decision support system</u> <u>The Waikato Regional Council working with regional stakeholders will:</u> <u>a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u> <u>For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located."</u>
3.11.4.1 Working with others	PC1-12255	Support the provision with amendments	AMEND Method 3.11.4.1 to read: " <u>Working with others</u> <u>Waikato and Waipā River Iwi partners and Regional Stakeholders.</u> Waikato Regional Council will work with <u>regional</u> stakeholders including..."
3.11.4.2 Certified Industry Scheme	PC1-12256	Support the provision with amendments	AMEND Method 3.11.4.2 to read: "Certified Industry Scheme... b. Oversight, and monitoring of Farm Environment Plans: c. Information <u>provisionsharing</u> ; d. <u>AggregateCollective</u> reporting on Certified... e. <u>Process for dealing with non-compliance by the Certified Industry Scheme</u> ; f. <u>Process for dealing with non-compliance by individual members of the Certified Industry Scheme</u> ; <u>and</u> e.g. Consistency across the various Certified Industry Schemes."
3.11.4.3 Farm Environment Plans	PC1-12258	Support the provision with amendments	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation actions</u> to reduce those risks <del>in order</del> to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with <del>more</del> <u>standardised</u> monitoring <u>programme</u> and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on</u> risk assessment <u>and the outcome of previous monitoring results</u> . <u>Waikato Regional Council will prepare an audit schedule for undertaking robust third party audit (independent of the farmer and Certified Farm Environment Planner) and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans."</u>
3.11.4.4 Lakes and Whangamarino Wetland	PC1-12259	Support the provision with amendments	AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working with <del>others</del> <u>stakeholders</u> , will:

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment.</u></p> <p><del>a-b. Build on the Shallow Lakes Management Plan by...</del></p> <p><del>b-c. Prepare and implement Lake Catchment Plans with community involvement which include :</del></p> <p>i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community).</u>"</p>
3.11.4.5 Sub-catchment scale planning	PC1-12261	Support the provision with amendments	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where <del>it has been shown to be required</del> <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently.</u> Sub-catchment planning..."
3.11.4.6 Funding and implementation	PC1-12262	Support the provision	RETAIN Method 3.11.4.6.
3.11.4.7 Information needs to support any future allocation	PC1-12263	Support the provision with amendments	AMEND Method 3.11.4.7 to read: "Gather information and commission... any <del>future</del> framework for the allocation of diffuse discharges <u>by 2026</u> including:
			<p>a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits <del>in the future</del> ...</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>
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-12264	Support the provision with amendments	AMEND Method 3.11.4.8 to read: "...b. Use <del>this to inform future</del> <u>the best available information to develop</u> changes to the Waikato Regional Plan <u>by 2026</u> to manage discharges..."
3.11.4.9 Managing the effects of urban development	PC1-12266	Support the provision with amendments	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built environment <del>which anticipates and addresses</del> <u>to address the cumulative effect of urban development on water quality over the long-term.</u> "
3.11.4.10 Accounting system and monitoring	PC1-12269	Support the provision with amendments	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including <del>biological</del> monitoring tools... Community Index and <u>Cultural Health Index</u> to provide the basis for... d. <del>An information</del> <u>A freshwater accounting system that accounts for the diffuse discharges that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at the enterprise or property scale...</u> "
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-12270	Support the provision with amendments	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. <del>Review and report</del> <u>Report on the progress towards and achievement of the 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.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-12271	Support the provision	RETAIN Method 3.11.4.12.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5 Rules	PC1-12273	Support the provision with amendments	AMEND the heading of Rule 3.11.5 to read: "3.11.5 <u>Land Use</u> Rules/Nga Ture."
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-12274	Support the provision	RETAIN Rule 3.11.5.1.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-7567	Not stated	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> " If the Nitrogen Reference Point is to be used ensure compliance is assessed using a long term average of Nitrogen losses from the property AMEND PPC1 to encourage the use of a range of mitigation tools such as the Waikato Regional Council's MENUS of mitigations
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-7568	Not stated	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan <del>provided</del> <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 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. If the Nitrogen Reference Point is to be used ensure compliance is assessed using a long term average of Nitrogen losses from the property. AMEND PPC1 to encourage the use of a range of mitigation tools such as the Waikato Regional Council's MENUS of mitigations.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-7569	Not stated	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 <del>undertaking</del> <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 <del>shall be</del> amended..." If the Nitrogen Reference Point is to be used ensure compliance is assessed using a long term average of Nitrogen losses from the property AMEND PPC1 to encourage the use of a range of mitigation tools such as the Waikato Regional Council's MENUS of mitigations.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-7570	Not stated	If the Nitrogen Reference Point is to be used ensure compliance is assessed using a long term average of Nitrogen losses from the property AMEND PPC1 to encourage the use of a range of mitigation tools such as the Waikato Regional Council's MENUS of mitigations

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-7571	Not stated	RETAIN Rule 3.11.5.6 If the Nitrogen Reference Point is to be used AMEND to ensure compliance is assessed using a long term average of Nitrogen losses from the property Rule 3.11.5.6: AMEND PPC1 to encourage the use of a range of mitigation tools such as the Waikato Regional Council’s MENUS of mitigations.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-7572	Not stated	RETAIN Rule 3.11.5.7. If the Nitrogen Reference Point is to be used, AMEND to ensure compliance is assessed using a long term average of Nitrogen losses from the property Rule 3.11.5.7: AMEND PPC1 to encourage the use of a range of mitigation tools such as the Waikato Regional Council’s MENUS of mitigations
Schedule A - Registration with Waikato Regional Council	PC1-12277	Support the provision with amendments	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. <u>A map of the property showing all land parcels</u> c. Legal description of the <u>individual land parcels that comprise the property or enterprise</u> as per the certificate(s) of title... 6. Properties that graze livestock must also provide <u>aan additional</u> map showing:... ii. <u>Confirmation of water</u> Water bodies listed in Schedule C ( <u>and provided by Waikato Regional Council in a map</u> ) for stock exclusion within..."
Schedule B - Nitrogen Reference Point	PC1-7573	Not stated	AMEND Schedule B to read: "A property or enterprise with a... b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> <del>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months)</del> within the reference period (specified in clause f)... f. The reference period is <u>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)</u> <del>the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable...</del> " AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions: <ul style="list-style-type: none"><li>(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>"</li></ul> 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> " 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> " 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> "

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			<p>Soil description, second column, "<del>For dairy systems use</del> 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. <u>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> <p>If the Nitrogen Reference Point is to be used ensure compliance is assessed using a long term average of Nitrogen losses from the property</p> <p>AMEND PPC1 to encourage the use of a range of mitigation tools such as the Waikato Regional Council's MENUS of mitigations</p>
Schedule C - Stock exclusion	PC1-12278	Support the provision with amendments	<p>AMEND Schedule C to read: "Water bodies from which cattle...</p> <p>i. Any river that <del>is</del> continually <del>contains surface water</del> <u>flowing (i.e. that is not identified as an intermittently flowing river).</u></p> <p>ii. Any drain <u>(including farm drain canal)</u> that continually contains surface water.</p> <p>iii. Any wetland, including a constructed wetland <u>that has a direct connection with continuously flowing surface water.</u>"</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12279	Support the provision with amendments	<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) <del>and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</del></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>i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses <del>from</del> <u>to</u> these areas through...</p> <p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; <u>and</u></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); and...</u></p> <p>4. A <u>detailed</u> description of the <u>following</u>:</p> <p><u>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</u></p>



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>risk assessment in 2 above (having regard to their relative priority) as well as where the mandatory <u>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 programme of works that sets out:</p> <p>a. The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</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> <p>iii. <u>Record of audit by independent third party accredited auditor.</u></p> <p>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.</p> <p>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."</p>
Schedule 2 - Certification of Industry Schemes	PC1-12280	Support the provision with amendments	<p>AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System</p> <p>The application must <u>clearly</u> demonstrate that the...</p> <p>a. <del>the achievement of</del>the water quality targets referred to...</p> <p>c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u></p> <p>d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u></p> <p>2. Has an appropriate ownership structure, governance arrangements and management (<u>including capacity and capability to undertake the coordinated management of Farm Management Plans.</u></p> <p>3. <u>Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</u></p> <p>4. <u>Has the appropriate resources to achieve its function and responsibilities under 1(a), including monitoring, auditing and reporting.</u></p> <p>35. <u>Has documented systems, processes, and...</u></p> <p>a. <u>Competent and consistent performance in preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></p> <p>b. <u>Effective internal monitoring of performance, including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. <u>Robust data management (both spatial and temporal)..</u></p> <p>d. ...</p> <p>e. <u>Timely and appropriate detailed reporting, including (but not limited to):</u></p> <p>i. <u>progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></p> <p>ii. <u>current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>f. Corrective actions will be implemented <u>where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></p> <p>g. <u>Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></p> <p>h. Internal quality control <u>and verification.</u></p> <p>i. The responsibilities <u>and accountability</u> of all parties to the Certified Industry Scheme are clearly stated <u>and enforced...</u></p> <p>j. An accurate and up to date register of scheme membership is <u>established and maintained ...</u></p> <p>k. ...</p> <p>l. The articles of the scheme, <u>including its register of membership</u> are available for public viewing.</p> <p>B. People</p> <p>The application must demonstrate...</p> <p>1. <del>Those</del>The nominated parties responsible for generating and auditing Farm Environment Plans are <u>Certified Farm Environment Planners suitably qualified and experienced.</u></p> <p>2. Auditing of Farm Environment Plans - <u>prepared under the Certified Industry Scheme - requirements will be undertaken by the parties that are accredited auditors</u> and independent of the Farm...</p> <p>c. Farm Environment Plans</p> <p>The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1."</p> <p>Or</p> <p>AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.</p>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-12231	Support the provision with amendments	<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 <i>a</i> 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 bottom of each Freshwater Management Unit.</p>
Additions to Glossary of Terms	PC1-12282	Support the provision with amendments	<p>ADD a NEW definition to read: "<u>Intermittently flowing river: Intermittently flowing river means a river or stream that, in its natural state during an average year, stops flowing on at least one occasion during the year.</u>"</p>
Definition - Enterprise	PC1-12281	Support the provision with amendments	<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>

# Te Taniwha o Waikato

Submitter ID: 73361

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-10891	Support the provision	Other than the specific decisions sought in this submission, only undertake amendments to Part A, Part B, Part C and Part D of PPC1 where those amendments will: 1. align with this submission's specific submission points; 2. strengthen and enhance PPC1 to achieve the Vision and Strategy; 3. assist in protecting the Values and achieving the Objectives within PPC1; 4. enable flexibility to achieve (and where possible exceed) water quality objectives of the Vision and Strategy earlier than the 80-year timeframe; 5. protect positive gains in achieving or exceeding water quality targets and maintain momentum to further improve water quality; 6. provide for reviews of PPC1 should water quality objectives not be achieved within the given timeframes; 7. provide appropriate support and resourcing to all sectors of the wider community so that the objectives of PPC1; and 8. align with the Waikato-Tainui Environmental Plan 'Tai Tumu, Tai Pari, Tai Ao' and Whakatupuranga 2050.
3.11.2 Objectives	PC1-12053	Support the provision	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units.</u> <u>Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u> " AND ADD Reasons for adopting Objective 6 to read: " <u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u> "
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-12047	Support the provision with amendments	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..."
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-12048	Support the provision with amendments	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity.</u> "
Objective 3: 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	PC1-12050	Support the provision	RETAIN Objective 3.
Objective 4: People and community resilience	PC1-12051	Support the provision	RETAIN Objective 4.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-12052	Support the provision	RETAIN Objective 5.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12054	Support the provision	RETAIN Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12055	Support the provision	RETAIN Policy 2.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-12056	Support the provision	RETAIN Policy 3.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-12057	Support the provision	RETAIN Policy 4.
Policy 5: Staged approach	PC1-12058	Support the provision	RETAIN Policy 5.
Policy 6: Restricting land use change	PC1-12059	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 <del>generally</del> not be granted. Land use change consent... that demonstrate <del>clear and enduring</del> <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> "
Policy 7: Preparing for allocation in the future	PC1-12060	Support the provision with amendments	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and <del>any</del> future property or... pathogens that <del>will</del> <u>may</u> be required by... that will assist in <del>defining 'land suitability'</del> <u>preparing any new allocation or management regime, ...</u> c. Minimise social disruption and costs in transition to <del>the 'land suitability'</del> any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability <del>will</del> <u>may</u> consider the following criteria:.. c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."
Policy 8: Prioritised implementation	PC1-12061	Support the provision	RETAIN Policy 8.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-12062	Support the provision	RETAIN Policy 9.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 10: Provide for point source discharges of regional significance	PC1-12063	Support the provision with amendments	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, <del>provide</del> have regard to the continued operation of: a. <del>Continued operation of</del> regionally significant infrastructure'; and b. <del>Continued operation of</del> regionally significant industry'."
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-12064	Support the provision	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects <del>to</del> from point source discharges... Require any person undertaking a point source discharge... effects of the discharge <del>at the time a resource consent application is decided</del> . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to <del>lessen any</del> by <u>offsetting</u> residual adverse effects of the discharge..."
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-12065	Support the provision with amendments	AMEND Policy 12 to read: "Consider the contribution made by a... microbial pathogen <del>catchment</del> loads <u>within a sub-catchment</u> and the impact of that contribution on the <del>likely</del> achievement of the... <del>d. The diminishing return on investment in the treatment plant upgrades in respect of any resultant reduction in nitrogen, phosphorus, sediment or microbial pathogens when treatment plant processes are already achieving a high level of contaminant reduction through the application of the Best Practicable Option*."</del>
Policy 13: Point sources consent duration	PC1-12066	Support the provision with amendments	AMEND Policy 13 to read: "When determining the... a. <del>A consent term exceeding 25 years, where</del> <u>The applicant demonstrates the approaches...</u> "
Policy 14: Lakes Freshwater Management Units	PC1-12067	Support the provision with amendments	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-12068	Support the provision	RETAIN Policy 16.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-12069	Support the provision	RETAIN Policy 17.
3.11.4 Implementation methods	PC1-12127	Support the provision with amendments	ADD a NEW Method to read: " <u>3.11.4.13 Decision support system</u> <u>The Waikato Regional Council working with regional stakeholders will:</u> <u>a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u> <u>For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located."</u>
3.11.4.1 Working with others	PC1-12070	Support the provision with amendments	AMEND Method 3.11.4.1 to read: "Working with <del>others</del> <u>Waikato and Waipā River Iwi partners and Regional Stakeholders.</u> Waikato Regional Council will work with <u>regional</u> stakeholders including..."
3.11.4.2 Certified Industry Scheme	PC1-12071	Support the provision with amendments	AMEND Method 3.11.4.2 to read: "Certified Industry Scheme... b. Oversight, and monitoring of Farm Environment Plans: c. Information <u>provisions</u> sharing;

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			d. <del>Aggregate</del> <u>Collective</u> reporting on Certified... e. <u>Process for dealing with non-compliance by the Certified Industry Scheme;</u> f. <u>Process for dealing with non-compliance by individual members of the Certified Industry Scheme;</u> and e.g. Consistency across the various Certified Industry Schemes."
3.11.4.3 Farm Environment Plans	PC1-12072	Support the provision with amendments	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation actions to reduce those risks in order to bring about reductions... develop guidance for undertaking risk assessments,...</u> Waikato Regional Council will... Farm Environment Plans, starting with <del>more</del> <u>standardised</u> monitoring <u>programme</u> and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on</u> risk assessment <u>and the outcome of previous monitoring results.</u> <u>Waikato Regional Council will prepare an audit schedule for undertaking robust third party audit (independent of the farmer and Certified Farm Environment Planner) and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans."</u>
3.11.4.4 Lakes and Whangamarino Wetland	PC1-12073	Support the provision with amendments	AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working with <del>others</del> <u>stakeholders</u> , will: a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment.</u> <del>a-b.</del> Build on the Shallow Lakes Management Plan by... <del>b-c.</del> Prepare and implement Lake Catchment Plans with community involvement which include : i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community).</u> "
3.11.4.5 Sub-catchment scale planning	PC1-12074	Support the provision with amendments	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where <del>it has been shown to be required</del> <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently.</u> Sub-catchment planning..."
3.11.4.6 Funding and implementation	PC1-12075	Support the provision	RETAIN Method 3.11.4.6.
3.11.4.7 Information needs to support any future allocation	PC1-12076	Support the provision with amendments	AMEND Method 3.11.4.7 to read: "Gather information and commission... any <del>future</del> <u>framework</u> for the allocation of diffuse discharges <u>by 2026</u> including: a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits <del>in the future</del> ... iv. Detailed evaluation of the range of options (including economic instruments) that are available <u>to allocate rights to discharge contaminants from land use."</u>
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-12077	Support the provision with amendments	AMEND Method 3.11.4.8 to read: "...b. Use <del>this to inform future</del> <u>the best available information to develop</u> changes to the Waikato Regional Plan <u>by 2026</u> to manage discharges..."
3.11.4.9 Managing the effects of urban development	PC1-12078	Support the provision with amendments	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built environment <del>which anticipates and addresses</del> <u>to address the cumulative effect of urban development on water quality</u> over the long-term."
3.11.4.10 Accounting system and monitoring	PC1-12079	Support the provision with amendments	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ...

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including <u>biological</u> monitoring tools... Community Index <u>and Cultural Health Index</u> to provide the basis for... d. <del>An information</del> <u>A freshwater accounting system that accounts for the diffuse discharges that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at the enterprise or property scale...</u> "
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-12122	Support the provision with amendments	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. <del>Review and report</del> <u>Report on the progress towards and achievement of the 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.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-12123	Support the provision	RETAIN Method 3.11.4.12.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-12129	Support the provision	RETAIN Rule 3.11.5.1.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-12130	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> "
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-12132	Support the provision with amendments	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan <del>provided</del> <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 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.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-12134	Support the provision with amendments	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 <del>undertaking</del> <u>implementing and putting in place</u> mitigation actions <u>identified in Farm Environment Plan that will maintain identified low levels of, or reduce the diffuse...</u> iii. The actions, timeframes and other... unless other suitable <u>and identified</u> mitigations are... vii. The timeframe and circumstance... Farm Environment Plan <del>shall be</del> <u>amended...</u> "
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-12136	Support the provision	RETAIN Rule 3.11.5.6.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-12139	Support the provision	RETAIN Rule 3.11.5.7.
Schedule A - Registration with Waikato Regional Council	PC1-12140	Support the provision with amendments	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. A map of the property showing all land parcels c. Legal description of the <u>individual land parcels that comprise the property or enterprise</u> as per the certificate(s) of title... 6. Properties that graze livestock must also provide <del>an additional</del> map showing:... ii. <u>Confirmation of water</u> <del>Water</del> bodies listed in Schedule C (and provided by Waikato Regional Council in a map) for stock exclusion within..."
Schedule B - Nitrogen Reference Point	PC1-12142	Support the provision with amendments	AMEND Schedule B to read: "A property or enterprise with a... b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> <del>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period</del> (specified in clause f)... f. The reference period is <del>an average of the five years between</del> <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) the two financial years covering 2014/2015 and 2015/2016</u> , except for commercial vegetable..." AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions: <ul style="list-style-type: none"><li>(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>"</li></ul> 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> " 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> " 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> " 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> " 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> "
Schedule C - Stock exclusion	PC1-12144	Support the provision with amendments	AMEND Schedule C to read: "Water bodies from which cattle... i. Any river that <del>is continually contains surface water</del> <u>is continually contains surface water</u> flowing (i.e. that is not identified as an <u>intermittently flowing river</u> ). ii. Any drain ( <u>including farm drain canal</u> ) that continually contains surface water.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule 2 - Certification of Industry Schemes	PC1-12147	Support the provision with amendments	<p>iii. Any wetland, including a constructed wetland <u>that has a direct connection with continuously flowing surface water.</u>"</p> <p>AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System The application must <u>clearly demonstrate that the...</u>  a. <del>the achievement of</del> the water quality targets referred to...  c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u>  d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u>  2. Has an appropriate ownership structure, governance arrangements and management (<u>including capacity and capability to undertake the coordinated management of Farm Management Plans.</u>  3. Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.  4. Has the appropriate resources to achieve its function and responsibilities under 1(a), <u>including monitoring, auditing and reporting.</u>  35. Has documented systems, processes, and...  a. Competent and consistent performance in <u>preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u>  b. Effective internal monitoring of performance, <u>including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u>  c. Robust data management (<u>both spatial and temporal</u>)...  d. ...  e. Timely and <del>appropriate-detailed</del> reporting, <u>including (but not limited to):</u>  i. <u>progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u>  ii. <u>current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u>  f. Corrective actions will be implemented <u>where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u>  g. <u>Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u>  h. Internal quality control <u>and verification.</u>  i. The responsibilities <u>and accountability</u> of all parties to the Certified Industry Scheme are clearly stated <u>and enforced</u>...  j. An accurate and up to date register of scheme membership is <u>established and maintained</u> ...  k. ...  l. The articles of the scheme, <u>including its register of membership</u> are available for public viewing.  B. People  The application must demonstrate...</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>1. <del>These</del>The nominated parties responsible for generating and auditing Farm Environment Plans are <u>Certified Farm Environment Planners</u> suitably qualified and experienced.</p> <p>2. Auditing of Farm Environment Plans - <u>prepared under the Certified Industry Scheme - requirements</u> will be undertaken by the parties that are accredited auditors and independent of the Farm...</p> <p>c. Farm Environment Plans The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1."</p> <p>Or AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.</p>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-12049	Support the provision with amendments	<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 <i>a</i> 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 bottom of each Freshwater Management Unit.</p>
Additions to Glossary of Terms	PC1-12149	Support the provision with amendments	ADD a NEW definition to read: " <u>Intermittently flowing river: Intermittently flowing river means a river or stream that, in its natural state during an average year, stops flowing on at least one occasion during the year.</u> "
Definition - Enterprise	PC1-12148	Support the provision with amendments	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..."

## Te Whakakitenga o Waikato Incorporated (Waikato-Tainui)

Submitter ID: 74105

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-13176	Not stated	No decision requested however, the submitter has made a joint submission, together with the other Waikato and Waipā River Iwi on PPC1 (the Joint Submission). The submitter endorses and supports the submissions made in the Joint Submission.
General	PC1-13177	Not stated	RETAIN the general direction that is articulated through PPC1. AND RETAIN the increased controls on land use to 'hold the line' and prevent future land use intensification.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND RETAIN the staged approach articulated through PPC1.
General	PC1-13178	Not stated	RECOGNISE and account for in PPC1 the contribution of Māori land in offsetting the discharge of contaminants from other developed land, at some stage in the future. RECOGNISE and protect the investment made by landowners, particularly the owners of Māori land, to reduce contaminants discharged from land use.
General	PC1-13179	Not stated	No specific decision requested for PPC1 however, the submitter recognises that further plan changes will be required to achieve Te Ture Whaimana within 80 years. The submitter is clear that any future framework for the allocation of rights to discharge contaminants, will not be based on a pure grandparenting approach.
General	PC1-13180	Not stated	No specific decision for PPC1 requested however the submitter notes that of particular importance, is building the capacity and capability of WRC, to give effect to the methods set out in PPC1. The submitter also notes that monitoring the effectiveness of PPC1 will be important to give confidence to the regional community that we are on target to achieving the short term objectives and tracking positively towards achieving Te Ture Whaimana in 80-years.
General	PC1-13181	Not stated	PROVIDE in PPC1 adequate resourcing to develop, with Waikato Tainui, an appropriate implementation plan that is delivered as planned and monitored through a proper monitoring programme.
3.11.2 Objectives	PC1-7769	Support the provision with amendments	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units.</u> <u>Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u> " AND ADD Reasons for adopting Objective 6 to read: " <u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u> "
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-7456	Support the provision with amendments	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..."
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-7499	Support the provision with amendments	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity.</u> "
Objective 3: 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	PC1-7589	Support the provision	RETAIN Objective 3.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 4: People and community resilience	PC1-7592	Support the provision	RETAIN Objective 4.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-7593	Support the provision	RETAIN Objective 5.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-7804	Support the provision	RETAIN Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-7805	Support the provision	RETAIN Policy 2.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-7812	Support the provision	RETAIN Policy 3.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-7818	Support the provision	RETAIN Policy 4.
Policy 5: Staged approach	PC1-7835	Support the provision	RETAIN Policy 5.
Policy 6: Restricting land use change	PC1-7848	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 <del>generally</del> not be granted. Land use change consent... that demonstrate <del>clear and enduring</del> <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> "
Policy 7: Preparing for allocation in the future	PC1-7850	Support the provision with amendments	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and <del>any</del> future property or... pathogens that <del>will</del> <u>may</u> be required by... that will assist in <del>defining 'land suitability'</del> <u>preparing any new allocation or management regime. ...</u> c. Minimise social disruption and costs in transition to <del>the 'land suitability'</del> any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability <del>will</del> <u>may</u> consider the following criteria:.. c. the natural capacity of the landscape <del>within a sub-catchment</del> <u>within a sub-catchment</u> to attenuate contaminant loss; and..."
Policy 8: Prioritised implementation	PC1-7878	Support the provision	RETAIN Policy 8.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-7881	Support the provision	RETAIN Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-7883	Support the provision with amendments	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, <del>provide</del> <u>have regard to the continued operation of:</u> a. <del>Continued operation of</del> regionally significant infrastructure'; and b. <del>Continued operation of</del> regionally significant industry'."
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-7884	Support the provision	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects <del>to</del> <u>from</u> point source discharges... Require any person undertaking a point source discharge... effects of the discharge <del>at the time a resource consent application is decided</del> . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to <del>lessen any</del> <u>by offsetting</u> residual adverse effects of the discharge..."
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-7931	Support the provision with amendments	AMEND Policy 12 to read: "Consider the contribution made by a... microbial pathogen <del>catchment</del> loads <u>within a sub-catchment</u> and the impact of that contribution on the <u>likely</u> achievement of the... <del>d. The diminishing return on investment in the treatment plant upgrades in respect of any resultant reduction in nitrogen, phosphorus, sediment or microbial pathogens when treatment plant processes are already achieving a high level of contaminant reduction through the application of the Best Practicable Option*.</del> "
Policy 13: Point sources consent duration	PC1-7963	Support the provision with amendments	AMEND Policy 13 to read: "When determining the... a. <del>A consent term exceeding 25 years, where</del> <u>the applicant demonstrates the approaches...</u> "
Policy 14: Lakes Freshwater Management Units	PC1-7966	Support the provision with amendments	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-7978	Support the provision	RETAIN Policy 16.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-7985	Support the provision	RETAIN Policy 17.
3.11.4 Implementation methods	PC1-8076	Support the provision	ADD a NEW Method to read: " <u>3.11.4.13 Decision support system</u> <u>The Waikato Regional Council working with regional stakeholders will:</u> a. <u>Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u> <u>For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located.</u> "
3.11.4.1 Working with others	PC1-7986	Support the provision with amendments	AMEND Method 3.11.4.1 to read: "Working with <del>others</del> <u>Waikato and Waipā River Iwi partners and Regional Stakeholders.</u>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			Waikato Regional Council will work with <u>regional</u> stakeholders including..."
3.11.4.2 Certified Industry Scheme	PC1-7988	Support the provision with amendments	AMEND Method 3.11.4.2 to read: "Certified Industry Scheme... b. Oversight, and monitoring of Farm Environment Plans: c. Information <u>provision</u> sharing; d. <del>Aggregate</del> <u>Collective</u> reporting on Certified... e. <u>Process for dealing with non-compliance by the Certified Industry Scheme</u> ; f. <u>Process for dealing with non-compliance by individual members of the Certified Industry Scheme</u> ; <u>and</u> e.g. Consistency across the various Certified Industry Schemes."
3.11.4.3 Farm Environment Plans	PC1-7992	Support the provision with amendments	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation</u> actions to reduce those risks <del>in order</del> to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with <del>more</del> <u>standardised</u> monitoring <u>programme</u> and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on risk assessment and the outcome of previous monitoring results</u> . <u>Waikato Regional Council will prepare an audit schedule for undertaking</u> robust third party audit (independent of the farmer and Certified Farm Environment Planner) <del>and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans."</del>
3.11.4.4 Lakes and Whangamarino Wetland	PC1-7999	Support the provision with amendments	AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working with <del>others</del> <u>stakeholders</u> , will: a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment</u> . <del>a-b.</del> Build on the Shallow Lakes Management Plan by... <del>b-c.</del> Prepare and implement Lake Catchment Plans with community involvement which include : i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community)</u> ."
3.11.4.5 Sub-catchment scale planning	PC1-8025	Support the provision with amendments	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where it <del>has been shown to be required</del> <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently</u> . Sub-catchment planning..."
3.11.4.6 Funding and implementation	PC1-8032	Support the provision	RETAIN Method 3.11.4.6.
3.11.4.7 Information needs to support any future allocation	PC1-8038	Support the provision with amendments	AMEND Method 3.11.4.7 to read: "Gather information and commission... any <del>future</del> framework for the allocation of diffuse discharges <u>by 2026</u> including: a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits <del>in the future</del> ... <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> "
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-8045	Support the provision with amendments	AMEND Method 3.11.4.8 to read: "...b. Use <del>this to inform future</del> <u>the best available information to develop changes to the Waikato Regional Plan by 2026 to manage discharges...</u> "

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.4.9 Managing the effects of urban development	PC1-8055	Support the provision with amendments	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built environment <del>which anticipates and addresses to address the cumulative effect of urban development on water quality</del> over the long-term."
3.11.4.10 Accounting system and monitoring	PC1-8060	Support the provision with amendments	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including <del>biological</del> monitoring tools... Community Index and <u>Cultural Health Index</u> to provide the basis for... d. <del>An information</del> <u>A freshwater accounting system that accounts</u> for the diffuse discharges <del>that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges</del> at the enterprise or property scale..."
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-8066	Support the provision with amendments	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. <del>Review and report</del> <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.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-8075	Support the provision	RETAIN Method 3.11.4.12.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-8077	Support the provision	RETAIN Rule 3.11.5.1.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-8078	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> "
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-8079	Support the provision with amendments	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan <del>provided</del> <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 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.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-8080	Support the provision with amendments	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 <del>undertaking</del> <u>implementing and putting in place</u> mitigation actions <u>identified in Farm Environment Plan that will maintain 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 <del>shall be</del> amended..."

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-8082	Support the provision	RETAIN Rule 3.11.5.6.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-8085	Support the provision	RETAIN Rule 3.11.5.7.
Schedule A - Registration with Waikato Regional Council	PC1-8086	Support the provision	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. <u>A map of the property showing all land parcels</u> c. Legal description of the <u>individual land parcels that comprise the property or enterprise</u> as per the certificate(s) of title... 6. Properties that graze livestock must also provide <u>an additional</u> map showing:... ii. <u>Confirmation of water bodies listed in Schedule C (and provided by Waikato Regional Council in a map)</u> for stock exclusion within..."
Schedule B - Nitrogen Reference Point	PC1-8132	Support the provision with amendments	AMEND Schedule B to read: "A property or enterprise with a... b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> <del>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months)</del> within the reference period (specified in clause f)... f. The reference period is <u>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)</u> <del>the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable...</del> " AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions: <ul style="list-style-type: none"><li>• (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>"</li></ul> 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> " 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> " 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> " 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> " 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> "



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule C - Stock exclusion	PC1-8114	Support the provision with amendments	AMEND Schedule C to read: "Water bodies from which cattle... i. Any river that <del>is continually contains surface water</del> <u>flowing (i.e. that is not identified as an intermittently flowing river)</u> . ii. Any drain ( <u>including farm drain canal</u> ) that continually contains surface water. iii. Any wetland, including a constructed wetland <u>that has a direct connection with continuously flowing surface water.</u> "
Schedule 1 - Requirements for Farm Environment Plans	PC1-8147	Support the provision with amendments	AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain... 1.c. A list of land parcels which... i. the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) <del>and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</del> iii. <u>The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u> 2. An assessment of the risk of diffuse discharge.. farming activities on the property <u>or enterprise</u> , and the priority of... a. A description of where and how... i. the <u>location and</u> provision of fencing and livestock... ii. for areas with a slope... is impracticable, the <u>location and</u> provision of alternative... c. A description of the critical source areas... i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses <del>from</del> <u>to</u> these areas through... e. A description of nutrient management practices... i. a nutrient budget...Waikato Regional Council; <u>and</u> <u>ii. an assessment of the assumptions used in a nutrient budget for the property and an opinion on material differences.</u> f. A description of cultivation management... d. <u>Establishing and</u> maintaining appropriate buffers... 3. A spatial risk map(s) at a scale that clearly shows: a. The boundaries of the property <u>or enterprise (if different)</u> ; and... 4. A <u>detailed</u> description of the <u>following</u> : <u>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> 5. A <u>detailed</u> description of the following: a. <u>Mitigation</u> actions, timeframes and other... <u>6. A programme of works that sets out:</u> <u>a. The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</u> <u>i. Record of inspection by Waikato Regional Council staff or;</u> <u>ii. Record of inspection by Certified Industry Scheme staff; and</u> <u>iii. Record of audit by independent third party accredited auditor.</u>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>7. <u>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>8. <u>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>
Schedule 2 - Certification of Industry Schemes	PC1-8165	Support the provision with amendments	<p>AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System The application must <u>clearly demonstrate that the...</u></p> <p>a. <del>the achievement of</del>the water quality targets referred to...</p> <p>c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u></p> <p>d. <del>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</del></p> <p>2. Has an appropriate ownership structure, governance arrangements and management (<u>including capacity and capability to undertake the coordinated management of Farm Management Plans.</u></p> <p>3. Has the in-house capability to coordinate the collective mitigation measures identified in the <u>Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</u></p> <p>4. Has the appropriate resources to achieve its function and responsibilities under 1(a), including <u>monitoring, auditing and reporting.</u></p> <p>35. Has documented systems, processes, and...</p> <p>a. Competent and consistent performance in <u>preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></p> <p>b. Effective internal monitoring of performance, <u>including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. Robust data management (<u>both spatial and temporal</u>)...</p> <p>d. ...</p> <p>e. Timely and <del>appropriate</del> <u>detailed reporting, including (but not limited to):</u></p> <p>i. <u>progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></p> <p>ii. <u>current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></p> <p>f. Corrective actions will be implemented <u>where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></p> <p>g. <u>Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></p> <p>h. Internal quality control <u>and verification.</u></p> <p>i. The responsibilities <u>and accountability</u> of all parties to the Certified Industry Scheme are clearly stated <u>and enforced</u>...</p> <p>j. An accurate and up to date register of scheme membership is <u>established and maintained</u> ...</p> <p>k. ...</p> <p>l. The articles of the scheme, <u>including its register of membership</u> are available for public viewing.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>B. People The application must demonstrate...</p> <p>1. <del>Those</del><u>The nominated parties responsible for generating and auditing Farm Environment Plans are Certified Farm Environment Planners suitably qualified and experienced.</u></p> <p>2. <del>Auditing of Farm Environment Plans - prepared under the Certified Industry Scheme - requirements will be undertaken by the parties that are accredited auditors and independent of the Farm...</del></p> <p>c. Farm Environment Plans The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1." Or AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.</p>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-7491	Support the provision with amendments	<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. 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 main stem and sub-catchments. AND RETAIN the 80-year numerical targets for Chlorophyll <i>a</i> 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>
Additions to Glossary of Terms	PC1-8123	Support the provision with amendments	ADD a NEW definition to read: " <u>Intermittently flowing river: Intermittently flowing river means a river or stream that, in its natural state during an average year, stops flowing on at least one occasion during the year.</u> "
Definition - Enterprise	PC1-8173	Support the provision with amendments	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..."

# Te Whenua O Matata Ltd

Submitter ID: 68016

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4701	Oppose the provision	AMEND PPC1 as per specific matters in the submission (see other submission points). AMEND PPC1 as per the Federated Farmers submission.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-4481	Oppose the provision	<p>Rule 3.11.5.3: Combine the Farm Environment Plan with current requirements of Fonterra and allow a Farm Environment Plan to be drawn up by a number of people, including the farmer and accept it on merit.</p> <p>AND AMEND to extend the Farm Environment Plan timeline to allow for research and to verify</p> <p>AND AMEND to provide flexibility and reduce nitrogen</p> <p>AND AMEND Rule 3.11.5.3 as requested by Federated Farmers in their submission</p> <p>[Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is:</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.</p> <p>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.</p> <p>AND DELETE Rule 3.11.5.2 (4) (c).</p> <p>AND ADD a NEW permitted activity rule to read:</p> <p><u>"The use of land for farming activities (excluding 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>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-4484	Oppose the provision	<p>Rule 3.11.5.4: Combine the Farm Environment Plan with current requirements of Fonterra and allow a Farm Environment Plan to be drawn up by a number of people, including the farmer and accept it on merit</p> <p>AND AMEND to extend the Farm Environment Plan timeline to allow for research and to verify</p> <p>AND AMEND to provide flexibility</p> <p>AND AMEND Rule 3.11.5.4 as requested by Federated Farmers in their submission</p> <p>[Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is:</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.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>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.</p> <p>AND DELETE Rule 3.11.5.2 (4) (c).</p> <p>AND ADD a NEW permitted activity rule to read:</p> <p><u>“The use of land for farming activities (excluding 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>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-4493	Oppose the provision	<p>AMEND Rule 3.11.5.7 as requested by Federated Farmers.</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>
Schedule B - Nitrogen Reference Point	PC1-4495	Oppose the provision	<p>AMEND to provide flexibility to the base years, that recognise the range of matters that need to influence farm management decisions</p> <p>AND CONSIDER alternatives to OVERSEER</p> <p>AND AMEND Schedule B as requested by Federated Farmers in here</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>
Schedule C - Stock exclusion	PC1-4497	Oppose the provision	<p>AMEND so that the fencing of waterways does not cause other environmental issues</p> <p>AND AMEND Schedule C as requested by Federated Farmers</p> <p>[AMEND Schedule C 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 C</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 C match the Policies, Methods, definitions, etc. to which Schedule C relates</p> <p>AND REMOVE requirements for fencing off water bodies AND AMEND to adopt the Government’s Clean Water Package 2017 stock exclusion standards as an interim measure</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND DEVELOP more detailed proposals at a sub-catchment level later, through a freshwater management unit based assessment, and implemented then through a sub-catchment based plan change AND MAKE any consequential amendments to PPC1.]
Schedule 1 - Requirements for Farm Environment Plans	PC1-4498	Oppose the provision	AMEND so that there is no duplication of what is currently being done, such as through Fonterra requirements AND AMEND Schedule 1 as requested by Federated Farmers [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.]

## Thames-Coromandel District Council

Submitter ID: 74031

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-5854	Oppose the provision	PUT ON HOLD PPC1 and undertake further work to show a clearer understanding of the catchment and the significant effects of koi carp, and any solutions to that problem AND undertake testing and extrapolating the true cause of nutrient, E.coli and sedimentation to inform planning proposals going forward AND engage with all affected parties to ensure a contiguous planning response.

## The Greene Co Ltd

Submitter ID: 71658

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-3020	Oppose the provision	No specific decision sought for PPC1.
Policy 5: Staged approach	PC1-3022	Support the provision	No specific decision sought for Policy 5.

# The Royal Forest and Bird Protection Society of New Zealand Incorporated

Submitter ID: 74122

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8188	Not stated	AMEND PPC1 to reduce the timeframe for achieving ecosystem health, AND AMEND water quality objectives as set out in Table 1 (see submission) to ensure they provide for ecosystem health, AND AMEND to define with clarity good and best management practices, through the use of schedules which set these out in detail, AND AMEND to require that good management practice be achieved in the first instance and then best management practice if needed to achieve freshwater objectives, AND AMEND to clarify the requirement for the 75th percentile of dairy farmers being required to reduce by including it in policy, AND DELETE all reference to Certified Industry Schemes, AND DELETE all provisions relating to non-notification of resource consents.
3.11.1 Values and uses for the Waikato and Waipa Rivers	PC1-8190	Not stated	AMEND PPC1 to include Appendix 1 of the submission, which sets out appropriate freshwater objectives.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-8218	Support the provision with amendments	AMEND Objective 1 to read: " <u>Objective 1: The restoration and protection of water quality to achieve healthy rivers by 2050</u> <del>Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit</del> " AND RETAIN the explanation.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-8220	Support the provision with amendments	AMEND Objective 2 to read: " <u>Objective 2: The restoration, protection and enhancement of water quality contributes to social, economic and cultural well-being</u> <del>Social, economic and cultural well-being is maintained in the long term</del> "
Objective 3: 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	PC1-8221	Support the provision with amendments	AMEND Objective 3 to read: " <u>Objective 3: Immediate improvements are achieved in water quality in each sub-catchment and Freshwater Management Unit</u> <del>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</del> " 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, <del>are</del> 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"
Objective 4: People and community resilience	PC1-8224	Oppose the provision with amendments	AMEND Objective 4 to read: "A staged approach <del>to change enables people and communities to undertake adaptive management to continue to provide for their social, economic and cultural well-being in the short term while that requires:</del> a) <u>considering the values and uses when taking action to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens</u> to achieve the attribute targets for the Waikato and Waipā Rivers;

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			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".
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-8226	Support the provision with amendments	AMEND Objective 5(a)ii to read: " <u>While achieving the water quality attributes and targets in Table 3.11-1</u> actively sustain a relationship with ancestral land and with the rivers and others water bodies in the catchments."
Reasons for adopting Objective 1	PC1-8228	Oppose the provision with amendments	AMEND the Reasons for adopting Objective 1 to reflect the changes sought for Objective 1.
Reasons for adopting Objective 2	PC1-8229	Support the provision	RETAIN Reasons for adopting Objective 2.
Reasons for adopting Objective 3	PC1-8230	Oppose the provision with amendments	AMEND Reasons for adopting Objective 3 to reflect the changes sought in Objective 3 , AND AMEND to ensure that Council set dates for limits/targets in a rule to trigger a review of consents on a sub-catchment or Freshwater Management Unit basis.
Reasons for adopting Objective 4	PC1-8233	Oppose the provision with amendments	AMEND Objective 4 to read: <del>"A staged approach to change enables people and communities to undertake adaptive management to continue to provide for their social, economic and cultural well-being in the short term while that requires:</del> a) <del>considering the values and uses when taking action to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens</del> to achieve the attribute targets for the Waikato and Waipā Rivers; 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".
Reasons for adopting Objective 5	PC1-8235	Support the provision with amendments	AMEND Objective 5(a)ii to read: " <u>While achieving the water quality attributes and targets in Table 3.11-1</u> actively sustain a relationship with ancestral land and with the rivers and others water bodies in the catchments."
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-8236	Support the provision with amendments	AMEND Policy 1 to clarify what 'low level of contaminant discharge' is.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-8252	Oppose the provision with amendments	AMEND Policy 2 to read as follows: <del>"Policy 2: Tailored approach to r</del> Reducing diffuse discharges from farming activities. Manage and require reductions in sub-catchment wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from farming activities on properties and enterprises by: a. <del>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, 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</del> <u>Requiring the 75th percentile of dairy farms to reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to below the 75th percentile level by 2026;</u> b. <del>Requiring the same level of rigour in developing, monitoring and auditing of mitigation actions on the land that is set out in a Farm Environment Plan, whether it is established with a resource consent or through Certified Industry Schemes</del> <u>requiring all farming activities to operate using good management practice by 2019;</u> c. <u>where further reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial</u>



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p><del>pathogens are necessary, these are to be achieved by the use of best management practices;</del>  <del>d. where further reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens are necessary, these are:</del>  <del>(i) proportionate to the amount of current discharge for the activity operating at best management practices (those discharging more are expected to make greater reductions); and</del>  <del>(ii) proportionate to the scale of water quality improvement required in the sub-catchment;</del>  <del>d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment; and</del>  <del>e. mitigation</del> actions required to meet the reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens needed to achieve the losses under Policy 2(b) are specified in a Farm Environment Plan;  <del>ef. establishing a Nitrogen Reference Point for the property or enterprise; and</del>  <del>eg. requiring stock exclusion to be completed within 3 years following the dates by which a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026."</del></p>
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-8207	Oppose the provision with amendments	<p>ADD a permitted activity rule that gives effect to Policy 3, AND requires the creation of a Nitrogen Reference Point, AND requires that the information necessary to verify the conditions have been complied with on an ongoing basis            AND AMEND to ensure that any increase in diffuse discharged of contaminants associated with commercial vegetable production is treated as a non-complying activity            AND DELETE reference to a 'tailored approach'            AND DELETE Policy 3(f)            AND AMEND to define good and best management practice in a schedule.</p>
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-8256	Oppose the provision with amendments	<p>AMEND Policy 4 to read as follows: "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 <u>provided there is no increase in diffuse discharges nitrogen, phosphorus, sediment and microbial pathogens.</u>"</p>
Policy 5: Staged approach	PC1-8257	Oppose the provision with amendments	<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 <del>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 to long term where these are necessary to achieve the targets.</del>"</p>
Policy 6: Restricting land use change	PC1-8258	Oppose the provision with amendments	<p>AMEND Policy 6 to read:            "<del>Except as provided for in Policy 16, L</del>Land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens will <del>generally not be granted</del> <u>only be [granted] in exceptional circumstances.</u>            Land use change consent applications that <del>demonstrate clear and enduring</del> <u>provide for decreases in</u></p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens <u>that will ensure that the water quality targets set out in Table [3].11-1 will generally be granted.</u> "
Policy 7: Preparing for allocation in the future	PC1-8259	Support the provision with amendments	DELETE Policies 7(b) and (c).
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-8253	Oppose the provision with amendments	AMEND to ensure that actions such as edge of field mitigation measures are included in rule standards, matters of control and discretion and Farm Environment Plans AND DELETE Policy 9(d).
Policy 10: Provide for point source discharges of regional significance	PC1-8263	Oppose the provision	DELETE Policy 10 OR AMEND to define regionally significant infrastructure AND REMOVE industry from Policy 10 and ensure that regionally significant infrastructure and industry are considered in establishing any nutrient allocation approach, and that they meet best practice; and undertake measures to ensure water quality targets are achieved. AND CLARIFY how new activities are to be addressed.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-8264	Support the provision with amendments	REMOVE 'toxic' from Policy 11(a), AND REMOVE all reference to offsets from Policy 11, including the second sentence and clauses (b), (c) and (d).
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-8304	Oppose the provision with amendments	AMEND Policy 12(a) to provide for shorter timeframes sought by the submission, AND DELETE Policy 12(b) or clarify that this only applies to existing regionally significant infrastructure.
Policy 13: Point sources consent duration	PC1-8325	Support the provision with amendments	AMEND Policy 13 to read as follows: "Policy 13: Point sources consent duration. When determining an appropriate duration for any consent granted consider the following matters: a. <del>A consent term exceeding 25 years, where the applicant demonstrates the approaches set out in Policies 11 and 12 will be met; and</del> <u>whether the applicant demonstrates that the discharge is consistent with the water quality attribute targets set out in Table 3.11-1;</u> b. the magnitude and significance of the investment made or proposed to be made in contaminant reduction measures and any resultant improvements in the receiving water quality; and c. 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)."
Policy 14: Lakes Freshwater Management Units	PC1-8335	Support the provision with amendments	REPLACE " <del>2096</del> " with " <u>2050</u> " in Policy 14.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-8336	Oppose the provision	DELETE Policy 16.
3.11.4.1 Working with others	PC1-8386	Support the provision	RETAIN Method 3.11.4.1.
3.11.4.2 Certified Industry Scheme	PC1-8210	Oppose the provision	DELETE all reference to Certified Industry Schemes from PPC1.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.4.3 Farm Environment Plans	PC1-8209	Support the provision with amendments	AMEND Method 3.11.4.1 to ensure that past and future discharges are accurately recorded AND ensure that Farm Environment Plan implementation is monitored.
3.11.4.5 Sub-catchment scale planning	PC1-8396	Support the provision	RETAIN Method 3.11.4.5.
3.11.4.6 Funding and implementation	PC1-8398	Support the provision	AMEND Method 3.11.4.6 to include further detail on priorities for council resourcing of implementation.
3.11.4.7 Information needs to support any future allocation	PC1-8399	Support the provision	RETAIN Method 3.11.4.7.
3.11.4.9 Managing the effects of urban development	PC1-8406	Support the provision	RETAIN Method 3.11.4.9.
3.11.4.10 Accounting system and monitoring	PC1-8407	Support the provision	RETAIN Method 3.11.4.10
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-8408	Support the provision with amendments	AMEND Method 3.11.4.11 to include further monitoring and assessment of the effectiveness of the methods proposed to address water quality.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-8414	Support the provision with amendments	AMEND PPC1 to include new schedules that outline good and best management practice and incorporate these into the rules.
3.11.5 Rules	PC1-8194	Not stated	AMEND the rules to remove the ambiguity surrounding the 75th percentile AND include the 75th percentile requirement in the rules, not in Schedule 1, AND AMEND matters of control (ii) and (iii) and clause 5(a) of Schedule 1 to make it clear that reductions are expected in accordance with Objective 3 and Policy 2, AND AMEND to adopt require good management practices by all landowners, AND AMEND to ensure that where reductions beyond good management practices are needed to achieve water quality, the rules provide for best management practices.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-8423	Support the provision with amendments	AMEND Rule 3.11.5.1 to only apply to properties under 4.1 hectares OR AMEND Rule 3.11.5.1(5) to read as follows: " <del>For grazed land, the</del> The stocking rate of <u>any land being grazed, at any time, on the land</u> is less than 6 stock units per hectare <u>on the land being grazed at that time</u> ; and"
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-8425	Support the provision with amendments	AMEND Rule 3.11.5.2(3)(d) to ensure that landowners are required to provide Council with information regarding the land use activities that were occurring on 22 October 2016 and annually thereafter in a way that can be verified to meet the requirements of Rule 3.11.5.2(3)(b). AND AMEND to ensure that non-compliance with Rule 3.11.5.2(3) and (4) is a non-complying activity.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-8427	Oppose the provision	DELETE Rule 3.11.5.3
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm	PC1-8208	Oppose the provision with amendments	AMEND Rule 3.11.5.4 so that the permitted aspects are combined with Rule 3.11.5.3 AND AMEND to read as follows: " <u>Subject to Rule 3.11.5.6 and 3.11.5.7, except where the activity complies with as provided for in</u> Rule 3.11.5.1 and Rule 3.11.5.2 the use of land... is a <del>permitted activity until controlled activity from:...</del> "

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Environment Plan not under a Certified Industry Scheme			AND AMEND to ensure that activities that do not comply with Rules 3.11.5.1, 3.11.5.2 and 3.11.5.4 after the catchment dates are non-complying activities AND DELETE Rule 3.11.5.4(d) AND AMEND the matters of control in Rule 3.11.5.4 to reflect Policy 3 AND AMEND to ensure that any increase in diffuse discharges of contaminants associated with commercial vegetable production is a non-complying activity AND DELETE references that provide for non-notification.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-8211	Support the provision with amendments	DELETE Rule 3.11.5.5[4](d), AND AMEND the matters of control in Rule 3.11.5.5[4] to reflect Policy 3, AND AMEND to ensure that any increase in diffuse discharges of contaminants associated with commercial vegetable production is a non-complying activity, AND DELETE references that provide for non-notification.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-8213	Support the provision with amendments	AMEND Rule 3.11.5.6 to ensure that any increase in discharges from commercial vegetable production is a non-complying activity.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13115	Support the provision with amendments	Rule 3.11.5.6 - AMEND to ensure that non-compliance with Rule 3.11.5.2(3) and (4) is a non-complying activity AND DELETE references that provide for non-notification.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-8214	Support the provision with amendments	AMEND Rule 3.11.5.7 to ensure that any other activities that result in increased diffuse discharges are a non-complying activity. AND DELETE references that provide for non-notification.
Schedule A - Registration with Waikato Regional Council	PC1-8449	Support the provision with amendments	AMEND Schedule A to ensure that activities are operating at good or best management practice AND CLARIFY that Schedule A(5)(f) refers to those activities listed occurring at 22 October 2016.
Schedule B - Nitrogen Reference Point	PC1-8451	Support the provision with amendments	AMEND Schedule B(b) to the average annual nitrogen loss, not the highest.
Schedule C - Stock exclusion	PC1-8453	Support the provision	RETAIN Schedule C.
Schedule 1 - Requirements for Farm Environment Plans	PC1-8201	Support the provision with amendments	AMEND Schedule 1(5)(a) to ensure that Farm Environment Plans provide for reductions, rather than maintaining the status quo.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12539	Support the provision with amendments	AMEND Schedule 1 to include the following: a. Additional detail on irrigation management to identify irrigated areas on the property and/or a spatial risk map, and any soil moisture monitoring; d. Identification of any significant indigenous biodiversity, outstanding water bodies and sensitive receiving environments on or adjacent to the property.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12538	Support the provision with amendments	AMEND Schedule 1 to include the following: b. Clear and specific objectives for land use/ farm management that Farm Environment Plans can be assessed against; c. A clear requirement to calculate and include a Nitrogen Reference Point in the Farm Environment Plan.
Schedule 2 - Certification of Industry Schemes	PC1-8205	Oppose the provision	DELETE all reference to Certified Industry Schemes from PPC1.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Definition - Arable cropping	PC1-8452	Support the provision	RETAIN the definition for Arable Cropping.
Definition - Best management practice	PC1-8192	Support the provision with amendments	ADD a NEW Schedule XX that sets out the expectations for best management practice, including standards and measures that Council can enforce AND AMEND the definition for best management practice/s to read: <del>"For the purposes of Chapter 3.11, means maximum feasible mitigation to reduce the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens from land use activities given current technology"</del> Best management practice/s means the practices set out in Schedule XX" AND AMEND objectives and policies to ensure that all landowners have to achieve good management practices by 2019 AND AMEND to require the adoption of good management practice by all landowners and, if necessary work towards best management practice.
Definition - Certified Farm Environment Planner	PC1-8478	Support the provision with amendments	REMOVE the term 'entity' from the definition of Certified Farm Environment Planner AND ADD the following requirements: <del>"a. five years' experience in the management of pastoral, horticultural or arable farm systems; and; is a current member of a professional institute that requires members to subscribe to a Code of Ethics, and has a procedure in place for dealing with complaints made against members; and b. completed advanced training or a tertiary qualification in sustainable nutrient management (nitrogen and phosphorus) demonstrates to Waikato Regional Council proficiency in the auditing of Farm Environment Plans against the matters set out in Part X[c] of Schedule Y[7]."</del>
Definition - Certified Farm Nutrient Advisor	PC1-8494	Oppose the provision with amendments	AMEND the definition of Certified Farm Nutrient Advisor as follows: <del>"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 has the following qualifications and experience: means a person that holds a Certificate of Completion in Advanced Sustainable Nutrient Management in New Zealand Agriculture from Massey University:</del> a. <del>Has completed nutrient management training to at least an intermediate level, and has been certified by the New Zealand Institute for Primary Industry Management as meeting the criteria for a 'Certified Dairy Farm System Consultant'; or</del> b. <del>Has experience in nutrient management planning holds any other qualification, that has been approved by the Chief Executive of Waikato Regional Council has being an equivalent standard with respect to the knowledge and competencies required."</del>
Definition - Certified Industry Scheme	PC1-8497	Oppose the provision	DELETE the definition for Certified Industry Schemes.
Definition - Commercial vegetable production	PC1-8498	Support the provision with amendments	AMEND the definition for commercial vegetable production so the listed vegetables are examples, not a definitive list.
Definition - Cultivation	PC1-8678	Oppose the provision	DELETE (a)-(c) from the definition for cultivation.
Definition - Dairy Farming	PC1-8685	Support the provision with amendments	AMEND the definition for dairy farming to ensure that all activities associated with dairy farming and those that occur outside the milking season are included.
Definition - Diffuse discharge	PC1-8694	Support the provision	RETAIN the definition for diffuse discharge/s
Definition - Drain	PC1-8696	Support the provision	RETAIN the definition for drain
Definition - Drystock Farming	PC1-8697	Support the provision	RETAIN the definition for drystock farming.
Definition - Edge of field mitigation	PC1-8698	Support the provision	RETAIN the definition for edge of field mitigation/s

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Definition - Enterprise	PC1-8699	Support the provision	RETAIN the definition for enterprise/s.
Definition - Escherichia coli (E. coli)	PC1-8700	Support the provision	RETAIN the definition for Escherichia coli.
Definition - Farm Environment Plan	PC1-8701	Support the provision	RETAIN the definition for Farm Environment Plan/s.
Definition - Farming activities	PC1-8702	Support the provision with amendments	REMOVE the growing of crops on land irrigated by municipal wastewater discharge from the definition of farming activities.
Definition - Five-year rolling average	PC1-8703	Support the provision	RETAIN the definition of five-year rolling average.
Definition - Forage crop	PC1-8704	Support the provision	RETAIN the definition for forage crop.
Definition - Good Management Practice	PC1-8193	Support the provision with amendments	AMEND the definition of good management practice/s to read: <del>"For the purposes of Chapter 3.11, means industry agreed and approved practices and actions undertaken on a property or enterprise that reduce or minimise the risk of contaminants entering a water body</del> Means the practices set out in Schedule YY" AND ADD a NEW Schedule YY to set out the expectations for good management practice including enforceable standards and measures AND AMEND to require the adoption of good management practice by all landowners and, if necessary work towards best management practice AND AMEND objectives and policies to ensure that all landowners have to achieve good management practices by 2019.
Definition - Livestock crossing structure	PC1-8706	Support the provision	RETAIN the definition for livestock crossing structure.
Definition - Mahinga kai	PC1-8708	Support the provision	RETAIN the definition for mahinga kai.
Definition - Microbial pathogen	PC1-8709	Support the provision	RETAIN the definition for microbial pathogens.
Definition - Nitrogen Reference Point	PC1-8711	Support the provision with amendments	AMEND the definition for Nitrogen Reference Point to read as follows: <del>"Nitrogen Reference Point: 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. Nitrogen baseline means:</del> <u>a. the discharge of nitrogen below the root zone, as modelled with OVERSEER (where the required data is inputted into the model in accordance OVERSEER Best Practice Data Input Standards) or an equivalent model approved by the Chief Executive of Waikato Regional Council, averaged over a 24 month consecutive period covering two financial years 2014/2015 and 2015/2016 except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016, and expressed in kg per hectare per annum; and</u> <u>b[c]. if OVERSEER is updated, the most recent version is to be used to recalculate the nitrogen baseline using the same input data for the same period as used in (a) above."</u>
Definition - Offset	PC1-8719	Oppose the provision	DELETE the definition for offset/s.
Definition - Point source discharge	PC1-8722	Support the provision with amendments	AMEND the definition for point source discharge/s to read: <del>"For the purposes of Chapter 3.11 means discharge from a stationary or fixed facility, including the irrigation onto land from consented industrial and municipal wastewater systems. Means a discharge from a specific and identifiable outlet onto or into land, a water body or the sea."</del>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Definition - Restoration	PC1-8723	Support the provision	RETAIN the definition for restoration.
Definition - Setback	PC1-8724	Support the provision	RETAIN the definition for setback.
Consequential amendments to Waikato Regional Plan	PC1-8725	Support the provision	RETAIN with any amendments necessary to be consistent with the relief sought in the submission.

## The Surveying Company Ltd

Submitter ID: 73408

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-5743	Oppose the provision	No specific decision sought for PPC1.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-5661	Support the provision with amendments	AMEND Objective 1 and targets set in Table 3.11-1 to be less prescriptive and consistent with the National Policy Statement for Freshwater Management and the Vision and Strategy.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12657	Support the provision with amendments	AMEND Policy 1 to include an element of discretion for fencing through the Farm Environment Plan process.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-5664	Support the provision with amendments	ADD in Policy 1 (c) "... lakes <u>where practical to do so and a measurable gain to water quality will be achieved.</u> "
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12938	Oppose the provision	CLARIFY in Policy 2 whether the Nitrogen Reference Point would be attached to the land or the enterprise.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-5668	Support the provision with amendments	AMEND Policy 2 Farm Environment Plans to add detail on the land belonging to a property/enterprise including land to be acquired or disposed from the farming operation and land that is subdivided from, amalgamated to, leased or retired from a farming activity.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-5674	Oppose the provision with amendments	DELETE Policy 3 OR AMEND Policy 3 to remove capping the area of cropping enterprises. AND AMEND to take into account high class versatile soils and food producing areas of national significance. AND AMEND to undergo a sub-catchment specific approach which considers farming types prevalent in the area. AND AMEND Policy 3 to ensure consistency with Objectives 2 and 4.
Policy 6: Restricting land use change	PC1-5713	Oppose the provision	CLARIFY in Policy 6 whether the statement 'land use change consent applications that demonstrate an increase in the discharge of nitrogen, phosphorus, sediment or microbial pathogens will generally not be granted' is lawful.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-5726	Oppose the provision	REMOVE Nitrogen Reference Point from PPC1. AND REMOVE capping of area that may be cropped from PPC1.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-5739	Oppose the provision	AMEND Rule 3.11.5.7 so that where the contaminant discharge is the same or lower from the conversion, irrespective of farming type, the then conversion is permitted subject to the provision/update of a Farm Environment Plan. AND AMEND so that conversion to farming activities with a higher discharge is a controlled/Restricted Discretionary activity, with control/discretion to implementation of best practice measures and the provision/update of a Farm Environment Plan.

## The Worsp Family Trust

Submitter ID: 73997

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Full achievement of the Vision and Strategy will be intergenerational	PC1-5098	Oppose the provision	DELETE restricting land use change and Farm Environment Plan provisions in the section titled 'Full achievement of the Vision and Strategy will be intergenerational'.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-5073	Oppose the provision with amendments	DELETE Objective 1 in its entirety AND AMEND Objective 1 to consider all contributions to contaminant discharges including city storm water.
Objective 3: 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	PC1-5074	Oppose the provision with amendments	DELETE parts of Objective 3 relating to long term land use and Nitrogen Reference Point. AND AMEND Objective 3 to consider all contributions to contaminant discharges including city storm water.
Objective 4: People and community resilience	PC1-5076	Oppose the provision	DELETE Objective 4 in its entirety.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-5091	Oppose the provision	AMEND Policy 1 to consider all contributions to contaminant discharges including city storm water.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-5088	Oppose the provision	DELETE Policy 2 in its entirety AND if not declined AMEND to develop National Farm Environment Plan Guidelines, allow landowners to develop own Farm Environment Plan based on these guidelines and identify who will decide on Farm Environment Plan prerequisites.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12939	Oppose the provision	DELETE Policy 2 in its entirety AND AMEND Policy 2 to consider all contributions to contaminant discharges including city storm water.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-5089	Oppose the provision with amendments	AMEND Policy 4 to consider all contributions to contaminant discharges including city storm water.
Policy 5: Staged approach	PC1-5078	Oppose the provision	DELETE Policy 5 in its entirety
Policy 6: Restricting land use change	PC1-5086	Oppose the provision	DELETE Policy 6 in its entirety.
Policy 7: Preparing for allocation in the future	PC1-5079	Oppose the provision with amendments	DELETE Policy 7 provisions relating to long term land use and Nitrogen Reference Point. AND AMEND Policy 7 to consider all contributions to contaminant discharges including city storm water.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-5093	Support the provision	AMEND Policy 9 to include a sub-catchment approach into the rules. AND MAKE any consequential amendments arising from the submission process to include a sub-catchment approach.
3.11.4.1 Working with others	PC1-5094	Support the provision	AMEND Method 3.11.4.1 to include a sub-catchment approach in the rules. AND any consequential amendments arising from the submission process to include a sub-catchment approach.
3.11.4.5 Sub-catchment scale planning	PC1-5095	Support the provision	AMEND Method 3.11.4.5 to include a sub-catchment approach in the rules. AND any consequential amendments arising from the submission process to include a sub-catchment approach.
3.11.5 Rules	PC1-5099	Support the provision	ADD a NEW Rule for the elimination of koi carp. AND CONSIDER the all contributions to contaminant discharges including city storm water. AND MAKE any consequential amendments arising from the submission process.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-5085	Support the provision with amendments	AMEND Rule 3.11.5.1 to reflect stock exclusion recommendations/definitions in the National Policy Statement for Freshwater and the National Water Accord. AND AMEND Rule 3.11.5.1 to extend stock exclusion timelines. AND MAKE any stock exclusion consequential amendments arising from the submission process.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-5096	Support the provision	AMEND Rule 3.11.5.2 to reflect stock exclusion recommendations/definitions in the National Policy Statement for Freshwater and the National Water Accord AND AMEND Rule 3.11.5.2 to extend stock exclusion timelines AND MAKE any stock exclusion consequential amendments arising from the submission process.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-5080	Oppose the provision with amendments	DELETE from Rule 3.11.5.3 the provisions relating to Farm Environment Plans and the Nitrogen Reference Point. AMEND Rule 3.11.5.3 to reflect stock exclusion recommendations/definitions in the National Policy Statement for Freshwater and National Water Accord. AND AMEND Rule 3.11.5.3 to extend stock exclusion timelines. AND make any stock exclusion consequential amendments arising from the submission process. AND AMEND Rule 3.11.5.3 to consider all contributions to contaminant discharges including city storm water.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-5081	Oppose the provision with amendments	DELETE from Rule 3.11.5.4 provisions relating to long term land use, Farm Environment Plans and the Nitrogen Reference Point. AND AMEND Rule 3.11.5.4 to reflect stock exclusion recommendations/definition by the National Policy Statement for Freshwater and National Water Accord. AND AMEND Rule 3.11.5.4 to extend stock exclusion timelines. AND make any stock exclusion consequential amendments arising from the submission process. AND AMEND Rule 3.11.5.4 to consider contribution of all to contaminant discharges including city storm water.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-5082	Oppose the provision with amendments	DELETE from Rule 3.11.5.5 provisions relating to long term land use, Farm Environment Plans and the Nitrogen Reference Point. AND AMEND Rule 3.11.5.5 to consider contribution of all to contaminant discharges including city storm water.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-5097	Oppose the provision	DELETE Rule 3.11.5.6 in its entirety AND if not deleted, then AMEND to consider all contribution of all to contaminant loss including measuring city storm water.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-5087	Oppose the provision	DELETE from Rule 3.11.5.7 the provisions relating to restrictions in land use change. AND AMEND to consider all contributions to contaminant discharges including city storm water.
Schedule 1 - Requirements for Farm Environment Plans	PC1-5083	Oppose the provision with amendments	DELETE Schedule 1 in its entirety, AND AMEND Schedule 1 to consider contribution of all to contaminant discharges including city storm water.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-5090	Support the provision with amendments	AMEND Table 3.11-1 to add a rule for the elimination of koi carp AND AMEND to consider contribution of all to contaminant loss including city storm water.

## Thomas, Deverel Graeme

Submitter ID: 73407

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-7657	Oppose the provision with amendments	No specific decision sought Schedule B.

## Thomas, Graham

Submitter ID: 73447

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-9935	Support the provision with amendments	AMEND Policy 1 so that properties with the same soil type, contour and farming type have the same Nitrogen Reference Point.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12658	Support the provision with amendments	AMEND Policy 1 to ensure suitable land is used for dairy farming AND AMEND to introduce flexibility for land use change AND AMEND to allow land use rights to be tradable and transferable AMEND PPC1 to introduce an eradication policy of ducks, geese, swan and pukeko.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-9937	Support the provision with amendments	AMEND Policy 2 to ensure that properties with the same soil type, contour and farming type have the same Nitrogen Reference Point.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12940	Support the provision with amendments	AMEND Policy 2 to ensure suitable land is used for dairy farming AND AMEND to introduce flexibility for land use change AND AMEND to allow land use rights to be tradable and transferable. AND AMEND PPC1 to introduce an eradication policy of ducks, geese, swan and pukeko.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-9938	Support the provision with amendments	AMEND Rule 3.11.5.7 to allow for dairy farming on suitable land, where the rule needs to be more flexible. AND AMEND to allow land use rights to be tradable and transferrable.
Schedule B - Nitrogen Reference Point	PC1-11120	Oppose the provision	AMEND Schedule B so that properties with the soil type, contour and farming type have the same Nitrogen Reference point.

## Thomas, Kerry Louise

Submitter ID: 73877

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-3451	Not stated	No specific decision sought for PPC1.
3.11.5 Rules	PC1-3453	Oppose the provision	No specific decision sought for the Rules.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-3440	Support the provision with amendments	AMEND 3.11.5.2 to clarify how other point source emitters which do not have large acreage are captured in PPC1.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-3441	Oppose the provision	AMEND 3.11.5.3 as requested by Federated Farmers in their submission. [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is: 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.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>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.</p> <p>AND DELETE Rule 3.11.5.2 (4) (c).</p> <p>AND ADD a NEW permitted activity rule to read:</p> <p><u>"The use of land for farming activities (excluding 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>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-3442	Oppose the provision	<p>AMEND 3.11.5.4 as requested by Federated Farmers in their submission.</p> <p>[Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is:</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.</p> <p>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.</p> <p>AND DELETE Rule 3.11.5.2 (4) (c).</p> <p>AND ADD a NEW permitted activity rule to read:</p> <p><u>"The use of land for farming activities (excluding 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>
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-3443	Not stated	No specific relief sought for Rule 3.11.5.5.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-3445	Oppose the provision	<p>AMEND 3.11.5.7 as requested by Federated Farmers in their submission.</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>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-3447	Oppose the provision	AMEND Schedule B as requested by Federated Farmers in their submission. [AMEND Schedule B 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 B 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 B match the Policies, Methods, definitions, etc. to which Schedule B relates.]
Schedule C - Stock exclusion	PC1-3449	Oppose the provision	AMEND Schedule C as requested by Federated Farmers in their submission. [AMEND Schedule C 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 C 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 C match the Policies, Methods, definitions, etc. to which Schedule C relates AND REMOVE requirements for fencing off water bodies AND AMEND to adopt the Government's Clean Water Package 2017 stock exclusion standards as an interim measure AND DEVELOP more detailed proposals at a sub-catchment level later, through a freshwater management unit based assessment, and implemented then through a sub-catchment based plan change AND MAKE any consequential amendments to PPC1.]
Schedule 1 - Requirements for Farm Environment Plans	PC1-3450	Oppose the provision	AMEND Schedule 1 as requested by Federated Farmers in their submission. [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.]

## Thomson, Peter

Submitter ID: 71208

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6073	Oppose the provision	WITHDRAW PPC1 until the Waikato Regional Council can treat the whole of its catchments as one.
Objective 1: Long-term restoration and protection of water quality for	PC1-6064	Oppose the provision	WITHDRAW PPC1 and replace with objectives including numerical water quality limits/targets that consider the reality of the Waikato, which are achievable, provide for the protecting of its life

Plan Section	Submission Point ID	Support or Oppose	Decision requested
each sub-catchment and Freshwater Management Unit			supporting capacity, while also ensuring that the health and well-being, including social and economic values of people and communities, are safeguarded.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-6103	Oppose the provision	<p>DELETE the Rule 3.11.5.1 provisions that relate to excluding cattle from waterbodies through permanent fencing.</p> <p>AND AMEND Rule 3.11.5.1 so that the requirement to exclude cattle through permanent fencing be tailored on a farm by farm basis, district by district or sub-catchment basis where there is a scientifically proven water quality issue in relation to stock access.</p> <p>AND AMEND the Farm Environment Plan provisions to address actual risk targeting critical source areas rather than requiring blanket stock exclusion through permanent fencing.</p> <p>AND AMEND the stock exclusion provisions of Rule 3.11.5.1 so that it includes the ability to muster cattle through a water body without requiring a formed stock crossing structure when crossing less than three times a week.</p>
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-6121	Oppose the provision	<p>DELETE the Rule 3.11.5.2 provisions that relate to excluding cattle from waterbodies through permanent fencing.</p> <p>AND AMEND Rule 3.11.5.2 so that the requirement to exclude cattle through permanent fencing be tailored on a farm by farm basis, district by district or sub-catchment basis where there is a scientifically proven water quality issue in relation to stock access.</p> <p>AND AMEND the Farm Environment Plan provisions to address actual risk targeting critical source areas rather than requiring blanket stock exclusion through permanent fencing.</p> <p>AND AMEND the stock exclusion provisions of Rule 3.11.5.2 so that it includes the ability to muster cattle through a water body without requiring a formed stock crossing structure when crossing less than three times a week.</p>
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-6097	Oppose the provision	<p>REMOVE the requirement for sheep and beef farmers to have to manage to a Nitrogen Reference Point from Rule 3.11.5.3.</p> <p>AND AMEND the Nitrogen Reference Point calculations so that actual weights are used and therefore actual stock unit measurements.</p> <p>AND AMEND the Nitrogen Reference Point calculations so that where OVERSEER is used the Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing the use of standardised input parameters.</p> <p>AND RETAIN the Nitrogen Reference Point reduction to the 75th percentile.</p> <p>AND AMEND Rule 3.11.5.3 so that Farm Environment Plan are only required in sub-catchments where science indicates that improvements are required.</p> <p>AND AMEND the Farm Environment Plan provisions so they are tailored to the individual property and focus on critical source management rather than applying blanket regulatory standards. They need to allow flexibility such as with nitrogen discharges and application of management practices.</p> <p>AND AMEND the Farm Environment Plan provisions to address actual risk targeting critical source areas rather than requiring blanket stock exclusion through permanent fencing.</p> <p>AND AMEND to include provisions so that an independent panel is available to allow contested Farm Environment Plan points to be resolved without the need to appeal to the Environment Court.</p> <p>AND DELETE the Rule 3.11.5.3 provisions that relate to excluding cattle from waterbodies through permanent fencing.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND Rule 3.11.5.3 so that the requirement to exclude cattle through permanent fencing be tailored on a farm by farm basis, district by district or sub-catchment basis where there is a scientifically proven water quality issue in relation to stock access.</p> <p>AND AMEND the stock exclusion provisions of Rule 3.11.5.3 so that it includes the ability to muster cattle through a water body without requiring a formed stock crossing structure when crossing less than three times a week.</p>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-6098	Oppose the provision	<p>REMOVE Rule 3.11.5. 4 the requirement for sheep and beef farmers to have to manage to a Nitrogen Reference Point.</p> <p>AND AMEND the Nitrogen Reference Point calculations so that actual weights are used and therefore actual stock unit measurements.</p> <p>AND AMEND the Nitrogen Reference Point calculations so that where the OVERSEER Model is used the Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing the use of standardised input parameters.</p> <p>AND RETAIN the Nitrogen Reference Point reduction to the 75th percentile.</p> <p>AND AMEND Rule 3.11.5.4 so that Farm Environment Plan are only required in sub-catchments where science indicates that improvements are required.</p> <p>AND AMEND the Farm Environment Plan provisions so they are tailored to the individual property and focus on critical source management rather than applying blanket regulatory standards. They need to allow flexibility such as with nitrogen discharges and application of management practices.</p> <p>AND AMEND the Farm Environment Plan provisions to address actual risk targeting critical source areas rather than requiring blanket stock exclusion through permanent fencing.</p> <p>AND AMEND to include provisions so that an independent panel is available to allow contested Farm Environment Plan points to be resolved without the need to appeal to the Environment Court.</p> <p>AND DELETE the Rule 3.11.5.4 provisions that relate to excluding cattle from waterbodies through permanent fencing.</p> <p>AND AMEND Rule 3.11.5.4 so that the requirement to exclude cattle through permanent fencing be tailored on a farm by farm basis, district by district or sub-catchment basis where there is a scientifically proven water quality issue in relation to stock access.</p> <p>AND DELETE the 25 degree slope provisions in Rule 3.11.5.4 and REPLACE with farming intensity over 18 stock units per hectare.</p> <p>AMEND the stock exclusion provisions of Rule 3.11.5.4 so that it includes the ability to muster cattle through a water body without requiring a formed stock crossing structure when crossing less than three times a week.</p>
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-6095	Oppose the provision	<p>REMOVE the requirement for sheep and beef farmers to have to manage to a Nitrogen Reference Point through the Rule 3.11.5.5 provisions.</p> <p>AND AMEND Rule 3.11.5.5 so that actual weights are used to calculate the Nitrogen Reference Point and therefore actual stock unit measurements.</p> <p>AND AMEND Rule 3.11.5.5 so that where Overseer Model is used the Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing the use of standardised input parameters.</p> <p>AND RETAIN the Nitrogen Reference Point reduction to the 75th percentile.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13116	Oppose the provision with amendments	Rule 3.11.5.6 - REMOVE the requirement for sheep and beef farmers to have to manage to a Nitrogen Reference Point. AND AMEND the Nitrogen Reference Point calculations so that actual weights are used and therefore actual stock unit measurements. AND AMEND the Nitrogen Reference Point calculations so that where Overseer is used the Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing the use of standardised input parameters. AND RETAIN the Nitrogen Reference Point reduction to the 75th percentile.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13117	Oppose the provision with amendments	AMEND Rule 3.11.5.6 so that Farm Environment Plan are only required in sub-catchments where science indicates that improvements are required AND AMEND the Farm Environment Plan provisions so they are tailored to the individual property and focus on critical source management rather than applying blanket regulatory standards. They need to allow flexibility such as with nitrogen discharges and application of management practices AND AMEND to include provisions so that an independent panel is available to allow contested Farm Environment Plan points to be resolved without the need to appeal to the Environment Court.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-6093	Oppose the provision	AMEND Rule 3.11.5.6 so that flexible rules that relate to effects and the underlying soil properties are established rather than existing land use. Make exceptions for land areas below 40 hectares and where environmental effects are minimal or advantageous, such as improvements in biodiversity, sediment retention, phosphorous retention, economic efficiency and optimisation of natural resources. Restrictions and assessment of the effects should not be limited to consideration of the nitrogen discharges as modelled by OVERSEER. The flexibility needs to be low cost and with limited bureaucracy.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-6087	Oppose the provision	AMEND Rule 3.11.5.7 so that flexible rules that relate to effects and the underlying soil properties are established rather than existing land use. Make exceptions for land areas below 40 hectares and where environmental effects are minimal or advantageous, such as improvements in biodiversity, sediment retention, phosphorous retention, economic efficiency and optimization of natural resources. Restrictions and assessment of the effects should not be limited to consideration of the nitrogen discharges as modelled by OVERSEER. The flexibility needs to be low cost and with limited bureaucracy. AND REMOVE the requirement for sheep and beef farmers to have to manage to a Nitrogen Reference Point. AND AMEND the Nitrogen Reference Point calculations so that actual weights are used and therefore actual stock unit measurements. AND AMEND the Nitrogen Reference Point calculations so that where Overseer is used the Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing the use of standardised input parameters. AND RETAIN the Nitrogen Reference Point reduction to the 75th percentile.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-6080	Oppose the provision	<p>AND REMOVE the requirement for sheep and beef farmers to have to manage to a Nitrogen Reference Point through the Schedule B provisions.</p> <p>AND AMEND Schedule B so that actual weights are used and therefore actual stock unit measurements.</p> <p>AND AMEND Schedule B so that where OVERSEER is used the Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing the use of standardised input parameters.</p> <p>AND RETAIN the Nitrogen Reference Point reduction to the 75th percentile.</p>
Schedule C - Stock exclusion	PC1-6099	Oppose the provision	<p>DELETE the Schedule C provisions that relate to excluding cattle from waterbodies through permanent fencing.</p> <p>AND AMEND Schedule C so that the requirement to exclude cattle through permanent fencing be tailored on a farm by farm basis, district by district or sub-catchment basis where there is a scientifically proven water quality issue in relation to stock access.</p> <p>AND AMEND the Farm Environment Plan provisions to address actual risk targeting critical source areas rather than requiring blanket stock exclusion through permanent fencing.</p> <p>AND AMEND Schedule C so that it includes the ability to muster cattle through a water body without requiring a formed stock crossing structure when crossing less than three times a week.</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-6096	Support the provision with amendments	<p>AMEND Schedule 1 so that Farm Environment Plan are only required in sub-catchments where science indicates that improvements are required.</p> <p>AND AMEND Schedule 1 so that Farm Environment Plans are tailored to the individual property and focus on critical source management rather than applying blanket regulatory standards. They need to allow flexibility such as with nitrogen discharges and application of management practices.</p> <p>AND AMEND to include provisions in Schedule 1 that an independent panel is available to allow contested Farm Environment Plan points to be resolved without the need to appeal to the Environment Court.</p>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-6071	Oppose the provision	<p>WITHDRAW PPC1 and replace with objectives including numerical water quality limits/targets that consider the reality of the Waikato, which are achievable, provide for the protecting of its life supporting capacity, while also ensuring that the health and well-being, including social and economic values of people and communities, are safeguarded.</p>
Definition - Stock unit	PC1-6085	Oppose the provision	<p>AMEND the Stock Unit definition so that actual weights are used and therefore actual stock unit measurements.</p> <p>AND AMEND the Stock Unit definition so that where OVERSEER is used the Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing the use of standardised input parameters.</p>

## Thorburn, Matthew Charles and Susan Raewyn

Submitter ID: 74043

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6671	Oppose the provision	WITHDRAW PPC1 until the Waikato Regional Council can treat the whole of its catchment as one.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-6665	Oppose the provision	WITHDRAW PPC1 and replace with objectives and numerical water quality limits/targets that consider the reality of the Waikato, are achievable, provide for the protection of its life supporting capacity, and also ensure that the health and well-being, including social and economic values of people and communities, are safeguarded.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-6672	Oppose the provision	DELETE the requirements in Rule 3.11.5.1 relating to excluding cattle from waterbodies through permanent fencing AND AMEND Rule 3.11.5.1 so, where there is a scientifically proven water quality issue related to stock access to waterbodies, the requirement to exclude cattle through permanent fencing be tailored on a farm by farm, district by district and sub-catchment basis, so there is flexibility to provide for alternative management arrangements for certain land uses and terrains to achieve the same outcome AND AMEND PPC1 so that Farm Environment Plans focus on addressing actual risk, targeting critical source areas rather than applying blanket stock exclusion through permanent fencing AND AMEND PPC1 to include the ability to muster cattle through a water body without requiring a formed stock crossing when crossing less than three times per week.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-6668	Oppose the provision	DELETE the requirements in Rule 3.11.5.2 relating to excluding cattle from waterbodies through permanent fencing AND AMEND Rule 3.11.5.2 so, where there is a scientifically proven water quality issue related to stock access to waterbodies, the requirement to exclude cattle through permanent fencing be tailored on a farm by farm, district by district and sub-catchment basis, so there is flexibility to provide for alternative management arrangements for certain land uses and terrains to achieve the same outcome AND AMEND PPC1 so that Farm Environment Plans focus on addressing actual risk, targeting critical source areas rather than applying blanket stock exclusion through permanent fencing AND AMEND PPC1 to include the ability to muster cattle through a water body without requiring a formed stock crossing when crossing less than three times per week.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-6677	Oppose the provision	DELETE the requirements in Rule 3.11.5.3 relating to excluding cattle from waterbodies through permanent fencing AND AMEND Rule 3.11.5.3, where there is a scientifically proven water quality issue related to stock access to waterbodies, so the requirement to exclude cattle through permanent fencing be tailored on a farm by farm, district by district and sub-catchment basis, so there is flexibility to provide for alternative management arrangements on certain land uses and terrains to achieve the same outcome AND AMEND PPC1 so that Farm Environment Plans focus on addressing actual risk targeting critical source areas rather than applying blanket stock exclusion through permanent fencing

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND PPC1 to include the ability to muster cattle through a water body without requiring a formed stock crossing when crossing less than three times per week</p> <p>AND REMOVE the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point</p> <p>AND AMEND to ensure where the OVERSEER Model is used that Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters</p> <p>AND AMEND to use the Olsen P from soil tests as a possible marker for nutrient losses</p> <p>AND AMEND PPC1 so Farm Environment Plans are only required in sub-catchments where science shows improvements are required</p> <p>AND AMEND the Farm Environment Plan rules to allow flexibility, such as with nitrogen discharges and application of good management practices, and are tailored to the individual property and focus on critical source management rather than applying blanket regulatory standards</p> <p>AND AMEND PPC1 so an independent panel is convened to allow contested points between staff and farmers in Farm Environment Plans to be addressed without the need to appeal to the Environment Court.</p>
<p>3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme</p>	<p>PC1-6678</p>	<p>Oppose the provision</p>	<p>DELETE the requirements in Rule 3.11.5.4 relating to excluding cattle from waterbodies through permanent fencing</p> <p>AND AMEND Rule 3.11.5.4, where there is a scientifically proven water quality issue related to stock access to waterbodies, so the requirement to exclude cattle through permanent fencing be tailored on a farm by farm, district by district and sub-catchment basis, so there is flexibility to provide for alternative management arrangements on certain land uses and terrains to achieve the same outcome</p> <p>AND AMEND PPC1 so that Farm Environment Plans focus on addressing actual risk targeting critical source areas rather than applying blanket stock exclusion through permanent fencing</p> <p>AND AMEND PPC1 to include the ability to muster cattle through a water body without requiring a formed stock crossing when crossing less than three times per week</p> <p>AND REMOVE the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point</p> <p>AND AMEND to ensure where the OVERSEER Model is used that Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters</p> <p>AND AMEND to use the Olsen P from soil tests as a possible marker for nutrient losses</p> <p>AND AMEND PPC1 so Farm Environment Plans are only required in sub-catchments where science shows improvements are required</p> <p>AND AMEND the Farm Environment Plan rules to allow flexibility, such as with nitrogen discharges and application of good management practices, and are tailored to the individual property and focus on critical source management rather than applying blanket regulatory standards</p> <p>AND AMEND PPC1 so an independent panel is convened to allow contested points between staff and farmers in Farm Environment Plans to be addressed without the need to appeal to the Environment Court.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-6679	Oppose the provision	REMOVE from Rule 3.11.5.5 the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point AND AMEND to ensure where the OVERSEER Model is used that Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters AND AMEND to use the Olsen P from soil tests as a possible marker for nutrient losses.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13118	Oppose the provision	AMEND Rule 3.11.5.6 to allow for flexibility by establishing provisions which manage effects and are based on the underlying soil properties and their productive potential AND AMEND Rule 3.11.5.6 to provide exceptions to land use change exceptions, including for smaller land areas (below 40 hectares) and where environmental effects are minimal or advantageous.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13119	Oppose the provision	AMEND PPC1 so the restrictions and assessment of effects is not limited to the consideration of nitrogen discharges as modelled by the OVERSEER Model. AND DELETE the Nitrogen Reference Point provisions. AND AMEND to ensure the application of the rules is low cost and with limited bureaucracy. AND REMOVE the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point AND AMEND to ensure where the Overseer Model is used that Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters AND AMEND to use the Olsen P from soil tests as a possible marker for nutrient losses AND AMEND PPC1 so Farm Environment Plans are only required in sub-catchments where science shows improvements are required.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13120	Oppose the provision	AMEND PPC1 so Farm Environment Plans are only required in sub-catchments where science shows improvements are required AND AMEND the Farm Environment Plan rules to allow flexibility, such as with nitrogen discharges and application of good management practices, and are tailored to the individual property and focus on critical source management rather than applying blanket regulatory standards AND AMEND PPC1 so an independent panel is convened to allow contested points between staff and farmers in Farm Environment Plans to be addressed without the need to appeal to the Environment Court.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-6673	Oppose the provision	DELETE the requirements in Rule 3.11.5.6 relating to excluding cattle from waterbodies through permanent fencing AND AMEND Rule 3.11.5.6 so, where there is a scientifically proven water quality issue related to stock access to waterbodies, the requirement to exclude cattle through permanent fencing be tailored on a farm by farm, district by district and sub-catchment basis, so there is flexibility to provide for alternative management arrangements on certain land uses and terrains to achieve the same outcome AND AMEND PPC1 so that Farm Environment Plans focus on addressing actual risk, targeting critical source areas rather than applying blanket stock exclusion through permanent fencing

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND PPC1 to include the ability to muster cattle through a water body without requiring a formed stock crossing when crossing less than three times per week.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-6674	Oppose the provision	<p>AMEND Rule 3.11.5.7 to allow for flexibility by establishing provisions which manage effects and are based on the underlying soil properties and their productive potential</p> <p>AND AMEND Rule 3.11.5.7 to provide exceptions to land use change exceptions, including for smaller land areas (below 40 hectares) and where environmental effects are minimal or advantageous</p> <p>AND AMEND PPC1 so the restrictions and assessment of effects is not limited to the consideration of nitrogen discharges as modelled by the OVERSEER Model</p> <p>AND DELETE the Nitrogen Reference Point provisions</p> <p>AND AMEND to ensure the application of the rules is low cost and with limited bureaucracy</p> <p>AND REMOVE the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point</p> <p>AND AMEND to ensure where the OVERSEER Model is used that Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters</p> <p>AND AMEND to use the Olsen P from soil tests as a possible marker for nutrient losses.</p>
Schedule B - Nitrogen Reference Point	PC1-6675	Oppose the provision	<p>REMOVE the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point</p> <p>AND AMEND Schedule B to use actual weights and therefore accurate stock measurements</p> <p>AND AMEND to ensure where the OVERSEER Model is used that Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardised input parameters</p> <p>AND AMEND to use the Olsen P from soil tests as a possible marker for nutrient losses.</p>
Schedule C - Stock exclusion	PC1-6670	Support the provision with amendments	<p>DELETE the requirements in Schedule C relating to excluding cattle from waterbodies through permanent fencing</p> <p>AND AMEND Schedule C so, where there is a scientifically proven water quality issue related to stock access to waterbodies, the requirement to exclude cattle through permanent fencing be tailored on a farm by farm, district by district and sub-catchment basis, so there is flexibility to provide for alternative management arrangements for certain land uses and terrains to achieve the same outcome</p> <p>AND AMEND PPC1 so that Farm Environment Plans focus on addressing actual risk, targeting critical source areas rather than applying blanket stock exclusion through permanent fencing</p> <p>AND AMEND PPC1 to include the ability to muster cattle through a water body without requiring a formed stock crossing when crossing less than three times per week.</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-6676	Oppose the provision	<p>AMEND PPC1 so Farm Environment Plans are only required in sub-catchments where science shows improvements are required</p> <p>AND AMEND the Farm Environment Plan provisions to allow flexibility, such as with nitrogen discharges and application of good management practices, and are tailored to the individual property and focus on critical source management rather than applying blanket regulatory standards</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND PPC1 so an independent panel is convened to allow contested points between staff and farmers in Farm Environment Plans to be addressed without the need to appeal to the Environment Court.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-6666	Oppose the provision	WITHDRAW PPC1 and replace with objectives and numerical water quality limits/targets that consider the reality of the Waikato, are achievable, provide for the protection of its life supporting capacity, and also ensure that the health and well-being, including social and economic values of people and communities, are safeguarded.
Definition - Stock unit	PC1-6669	Oppose the provision	AMEND Definition - Stock unit to use actual weights and therefore accurate stock measurements, rather than standardised input parameters.

## Tierney, Colm and Gaynor

Submitter ID: 73091

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7706	Support the provision	No specific decision sought for PPC1.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-7707	Support the provision	RETAIN Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-7709	Support the provision with amendments	RETAIN Policy 2(a) AND ADD a requirement to establish the current situation (management, infrastructure and actions) in the Farm Environment Plan. RETAIN Policy 2(b).
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12942	Support the provision with amendments	DELETE Policy 2(d) and replace it with the decision sought in the DairyNZ submission. [RETAIN the first sentence of Policy 2 and clause (b) and (c). AND AMEND Policy 2 (a) and (d) to read:  "a. Taking a tailored, risk based approach to define mitigation actions on the land <del>that will reduce</del> <u>for</u> diffuse discharges of nitrogen... d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the <del>amount</del> <u>risk</u> of current discharge <u>leaving a property from overland flow or leaching below the root zone, as identified in farm environment plans entering waterbodies</u> (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment <u>plan</u> ; and..." AND ADD a NEW clause (e) to read: " <u>Where sub-catchment plans do not exist, individual Farm Environment Plans shall ensure that that the risk of diffuse phosphorus, nitrogen, sediment, and microbial pathogens entering waterbodies is identified by suitably qualified and experienced</u>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<u>people, and time-bound and monitored actions are put in place to address risks of phosphorus, sediment and microbial contaminants. For diffuse nitrogen discharges, Farm Environment Plans will:</u> i. <u>ensure that nitrogen losses stay within a five year rolling average, and</u> ii. <u>for farms above the 75th percentile value, nitrogen losses decrease to that value, and</u> iii. <u>for all other farms, nitrogen losses do not exceed the Nitrogen Reference Point.</u> "]
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12943	Support the provision with amendments	RETAIN Policy 2(e).
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12941	Support the provision with amendments	RETAIN Policy 2(c) AND ADD the following words: " <u>Provide guidelines within the Farm Environment Plan to ensure that (i) farms with nitrogen losses lower than the 75th percentile, plan and implement good practice; and (ii) farms above the 75th percentile, plan and implement methods to reduce losses to below that value.</u> "
Policy 6: Restricting land use change	PC1-7710	Support the provision	RETAIN Policy 6.
3.11.4.2 Certified Industry Scheme	PC1-7711	Support the provision	RETAIN Method 3.11.4.2.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-7712	Support the provision with amendments	AMEND Rule 3.11.5.2(4)(e) to read "Where the property or enterprise contains any of the water bodies listed in Schedule C: i. <del>There shall be no cultivation within 5 metres of the water body</del> <u>The Farm Environment Plan will assess cultivatable land and recommend where cultivation can occur in regards to distance from waterways;</u> and 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"
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-7717	Support the provision with amendments	AMEND Rule 3.11.5.4 Matters of Control (iii) to read "The actions, timeframes and other measures to <del>ensure that</del> <u>manage</u> 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®, <del>does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified;</del> or constitute good management practice." AND RETAIN Rule 3.11.5.4 Matters of Control (iv) AND AMEND Rule 3.11.5.4 Matters of Control (iv) by ADDING a NEW point to read " <u>Where the Nitrogen Reference point falls between the 50th and 75th percentile identify and implement actions required to work towards industry good management practice by 1 July 2026. Nitrogen leaching must not exceed the Nitrogen Reference Point over a 5-year average</u> " AND AMEND Rule 3.11.5.4 Matters of Control (iv) by ADDING a NEW point to read " <u>Where the Nitrogen Reference Point falls between the 25th and 50th percentile continue with the use of good management practice to hold at or below the Nitrogen Reference Point over a 5-year average</u> " AND AMEND Rule 3.11.5.4 Matters of Control (iv) by ADDING a NEW point to read " <u>Where the Nitrogen Reference Point falls under the 25th percentile continue with the use of good management practice with the flexibility of 10% variation from the Reference Point over a 5-year average</u> ".

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-7714	Oppose the provision	AMEND Rule 3.11.5.7 to allow for flexibility between farm systems where it can be shown that all contaminant loss risks have been mitigated and losses are no greater than when under the previous land use.
Schedule C - Stock exclusion	PC1-7715	Oppose the provision	AMEND Schedule C (1) by extending the timeframe for stock exclusion on hill country drystock farms AND AMEND to make allowance within hill country drystock Farm Environment Plans for mitigation of the effects of stock in waterways without requiring stock exclusion.
Schedule 1 - Requirements for Farm Environment Plans	PC1-7716	Support the provision with amendments	AMEND Schedule 1(A)(5)(a) to read "Actions, timeframes and other measures to <del>ensure that</del> <u>manage</u> the diffuse discharge of nitrogen from the property or enterprise, as measured by the five-year <del>rolling</del> average annual nitrogen loss as determined by the use of the current version of OVERSEER®, <del>does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified;</del> or constitute good management practice." AND RETAIN Schedule 1(A)(5)(b) AND AMEND Schedule 1(A)(5) by ADDING a NEW point (c) to read " <u>Where the Nitrogen Reference Point falls between the 50th and 75th percentile identify and implement actions required to work towards industry good management practice by 1 July 2026. Nitrogen leaching must not exceed the Nitrogen Reference Point over a 5-year average.</u> " AND AMEND Schedule 1(A)(5) by ADDING a NEW point (d) to read " <u>Where the Nitrogen Reference Point falls between the 25th and 50th percentile continue with the use of good management practice to hold at or below the Nitrogen Reference Point over a 5-year average.</u> " AND AMEND Schedule 1(A)(5) by ADDING a NEW point (e) to read " <u>Where the Nitrogen Reference Point falls under the 25th percentile continue with the use of good management practice with the flexibility of 10% variation from the Reference Point over a 5-year average.</u> "

## Timberlands Limited

Submitter ID: 73036

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-3067	Oppose the provision	AMEND Objective 1 by expressing the 80 year numerical attribute targets for nitrogen as a single set of TN numerical attribute targets measured in the main stem of the Waikato River at the bottom of each Freshwater Management Unit. AND AMEND by revising the 10 year numerical nitrogen attribute targets to show greater consistency between sub-catchment loads, making sure that the degree of reduction required is proportionate to the amount of current discharge.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-3273	Support the provision with amendments	AMEND Policy 1 to read: "Manage <del>and require reductions in</del> 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 <del>provided these discharges do not increase;</del> "



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-3277	Support the provision with amendments	AMEND Policy 2 (c) to read: "Establishing a Nitrogen Reference Point for the property or enterprise <u>for the sole purpose of establishing an ability to reduce nitrogen loss</u> ; and" Or words to like effect.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-3308	Support the provision with amendments	AMEND Policy 3 (c) to read: "Establishing a Nitrogen Reference Point for the property or enterprise <u>for the sole purpose of establishing an ability to reduce nitrogen loss</u> ; and" Or words to like effect.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-3311	Support the provision	RETAIN Policy 4 as currently worded.
Policy 5: Staged approach	PC1-3313	Support the provision with amendments	AMEND Policy 5 to create a clearer implementation path toward achievement of the long term targets within the duration of the plan.
Policy 6: Restricting land use change	PC1-3318	Oppose the provision	DELETE Policy 6.
Policy 7: Preparing for allocation in the future	PC1-3323	Oppose the provision	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> "
Policy 8: Prioritised implementation	PC1-3411	Support the provision	RETAIN Policy 8 in its current form.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-3412	Support the provision with amendments	RETAIN Policy 9 AND AMEND to specify the timeframes for implementation of the cost effective mitigation.
3.11.4.3 Farm Environment Plans	PC1-3413	Support the provision with amendments	AMEND Method 3.11.4.3 to require a frequent and comprehensive monitoring programme to audit Farm Environment Plans.
3.11.4.5 Sub-catchment scale planning	PC1-3415	Support the provision with amendments	AMEND Method 3.11.4.5 to read as: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop sub-catchment scale plans <del>(where a catchment plan does not already exist)</del> and where it has shown to be <del>required</del> <u>developing a plan would result in achieving the 10 year water quality attribute targets more efficiently.</u> Sub-catchment planning..."
3.11.4.7 Information needs to support any future allocation	PC1-3416	Support the provision with amendments	AMEND Method 3.11.4.7 to read:

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			"Gather information and commission appropriate scientific research to inform any future <u>regulations to manage discharges to target high polluting activities</u> framework for the allocation of diffuse discharges by 2026 including:"
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-3422	Oppose the provision with amendments	AMEND Method 3.11.4.8 to read: "Waikato Regional Council will <u>use</u> : a. <del>Develop discharge allocation frameworks for individual properties and enterprises based raking into account the best available data, knowledge and technology at the time; and</del> b. <del>Use this on</del> information collected under the 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."
3.11.4.10 Accounting system and monitoring	PC1-3426	Support the provision	RETAIN Method 3.11.4.10 AND ENSURE the existing monitoring network is upgraded by adding new monitoring sites in sub-catchments where there are none and where the monitoring location is not appropriate (monitoring sites that were set up to monitor floods).
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-3427	Support the provision with amendments	AMEND Method 3.11.4.12 to read: "Waikato Regional Council will: a. <u>Require that Good Management Practices are implemented; and</u> a.b. <del>Develop and disseminate best management practice guidelines...</del> "
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-3430	Support the provision	RETAIN Rule 3.11.5.1.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-3431	Support the provision with amendments	AMEND Rule 3.11.5.2 to read as: "The use of land for farming activities... 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 <u>The property complies with the region-wide good management practice for pastoral land use; and</u> Either: 3. ..."
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-3433	Support the provision with amendments	AMEND Rule 3.11.5.3 to read as: "... 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> "
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-3435	Support the provision with amendments	AMEND Rule 3.11.5.4 to read as: "Except as provided for.. is a permitted activity until: 1. 1 January 2020 for properties or enterprises in Priority 1 sub-catchments listed in Table 3.11-2, <del>and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</del> 2. 1 January 2023 for properties or enterprises in Priority 2 sub-catchments listed in Table 3.11-2;

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			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 good management practices for pastoral land use; ...</u> "
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-3439	Support the provision with amendments	AMEND Rule 3.11.5.6 as appropriate to require a Good Management Practices approach as described for Rules 3.11.5.1 to 3.11.5.5.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-3454	Oppose the provision	DELETE Rule 3.11.5.7. RETAIN expiry date of 1 July 2026 if Rule 3.11.5.7 is not deleted.
Schedule A - Registration with Waikato Regional Council	PC1-3458	Support the provision	RETAIN Schedule A as written.
Schedule B - Nitrogen Reference Point	PC1-3460	Oppose the provision with amendments	AMEND Schedule B to read: "Schedule B- Nitrogen Reference Point ... as follows: a. The Nitrogen Reference Point must be calculated by a Certified Farm Nutrient Advisor to <del>determine</del> <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> <del>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months)</del> within the reference point 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> "
Schedule C - Stock exclusion	PC1-3465	Support the provision	RETAIN Schedule C in its current form.
Schedule 2 - Certification of Industry Schemes	PC1-3467	Support the provision with amendments	AMEND Schedule 2 to clearly identify the compliance action pathway, in the event that a land user of a Certified Industry Scheme does not follow or meet the deadlines of the Farm Environment Plan.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-4063	Oppose the provision	AMEND Objective 1 by expressing the 80 year numerical attribute targets for nitrogen as a single set of TN numerical attribute targets measured in the main stem of the Waikato River at the bottom of each Freshwater Management Unit. AND AMEND by revising the 10 year numerical nitrogen attribute targets to show greater consistency between sub-catchment loads, making sure that the degree of reduction required is proportionate to the amount of current discharge.

## TIM Nominees

Submitter ID: 73964

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8443	Not stated	CLARIFY expectations of PPC1 for commercial activities within urban areas. AND such other additional or consequential relief as is necessary to achieve consistency with the above and to satisfy the concerns of the submission; or AND such other alternative relief to satisfy the concerns of the submission.
Policy 6: Restricting land use change	PC1-8441	Oppose the provision	DELETE Policy 6.
3.11.4.3 Farm Environment Plans	PC1-8439	Support the provision	No specific decision sought for Method 3.11.4.3.
3.11.4.9 Managing the effects of urban development	PC1-8442	Oppose the provision	DELETE Method 3.11.4.9.
Map 3.11-2: Map of the Waikato and Waipa River catchments, showing sub-catchments	PC1-8440	Support the provision with amendments	CLARIFY whether Map 3.11-2 and associated provisions apply to the urban environment, and if so, clearly explain how.

## Tiroa E Trust

Submitter ID: 72544

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4124	Oppose the provision	PUT ON HOLD the PPC1 process until such a time that all and any part of the catchment implicated by the plan is included.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-4120	Oppose the provision with amendments	AMEND Rule 3.11.5.1 so that the implications of stock exclusion on steeper hill country are considered in more depth AND AMEND Rule 3.11.5.1 so that the fencing is required as a result of an assessment of the potential risk factors and fencing is done in order of priority AND AMEND Rule 3.11.5.1 so that consideration is given to alternative solutions on steep land, such as water reticulation installation AND AMEND Rule 3.11.5.1 so that consideration is given to matching stock exclusion to land use capability rather than directly to slope AND CONSIDER undertaking an industry wide capability assessment to assess who will complete the Farm Environment Plans AND CLARIFY for landowners and industry how Farm Environment Plans will be constructed and how the gains will be quantified AND AMEND PPC1 to provide clarity on how the monitoring of Farm Environment Plans will be undertaken and who will pay for it.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-4105	Oppose the provision	AMEND Rule 3.11.5.2 and the nitrogen reference years to allow long term averaging of nitrogen losses should the Nitrogen Reference Point be continued with

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND PPC1 to consider alternative tools such as the natural capital approach and MENU's</p> <p>AND AMEND PPC1 so that outputs from the OVERSEER Model are used as a guide to decision-making only</p> <p>AND AMEND 3.11.5.2 so that the implications of stock exclusion on steeper hill country are considered in more depth</p> <p>AND AMEND 3.11.5.2 so that the fencing is required as a result of an assessment of the potential risk factors and fencing is done in order of priority</p> <p>AND AMEND 3.11.5.2 so that consideration is given to alternative solutions on steep land, such as water reticulation installation</p> <p>AND AMEND 3.11.5.2 so that consideration is given to matching stock exclusion to land use capability rather than directly to slope</p> <p>AND undertake an industry wide capability assessment to assess who will complete the Farm Environment Plans</p> <p>AND show landowners and industry how Farm Environment Plans will be constructed and how the gains will be quantified</p> <p>AND AMEND PPC1 to provide clarity on how the monitoring of Farm Environment Plans will be undertaken and who will pay for it.</p>
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-4108	Oppose the provision	<p>AMEND Rule 3.11.5.3 and the nitrogen reference years to allow long term averaging of nitrogen losses should the Nitrogen Reference Point be continued with</p> <p>AND AMEND PPC1 to consider alternative tools such as the natural capital approach and MENU's</p> <p>AND AMEND PPC1 so that outputs from the OVERSEER Model are used as a guide to decision-making only</p> <p>AND AMEND 3.11.5.3 so that the implications of stock exclusion on steeper hill country are considered in more depth</p> <p>AND AMEND 3.11.5.3 so that the fencing is required as a result of an assessment of the potential risk factors and fencing is done in order of priority</p> <p>AND AMEND 3.11.5.3 so that consideration is given to alternative solutions on steep land, such as water reticulation installation</p> <p>AND AMEND 3.11.5.3 so that consideration is given to matching stock exclusion to land use capability rather than directly to slope</p> <p>AND undertake an industry wide capability assessment to assess who will complete the Farm Environment Plans</p> <p>AND show landowners and industry how Farm Environment Plans will be constructed and how the gains will be quantified</p> <p>AND AMEND PPC1 to provide clarity on how the monitoring of Farm Environment Plans will be undertaken and who will pay for it.</p>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-4109	Oppose the provision	<p>AMEND Rule 3.11.5.4 and the nitrogen reference years to allow long term averaging of nitrogen losses should the Nitrogen Reference Point be continued with</p> <p>AND AMEND PPC1 to consider alternative tools such as the natural capital approach and MENU's</p> <p>AND AMEND PPC1 so that outputs from the OVERSEER Model are used as a guide to decision-making only</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND 3.11.5.4 so that the implications of stock exclusion on steeper hill country are considered in more depth</p> <p>AND AMEND 3.11.5.4 so that the fencing is required as a result of an assessment of the potential risk factors and fencing is done in order of priority</p> <p>AND AMEND 3.11.5.4 so that consideration is given to alternative solutions on steep land, such as water reticulation installation</p> <p>AND AMEND 3.11.5.4 so that consideration is given to matching stock exclusion to land use capability rather than directly to slope</p> <p>AND undertake an industry wide capability assessment to assess who will complete the Farm Environment Plans</p> <p>AND show landowners and industry how Farm Environment Plans will be constructed and how the gains will be quantified</p> <p>AND AMEND PPC1 to provide clarity on how the monitoring of Farm Environment Plans will be undertaken and who will pay for it.</p>
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-4110	Oppose the provision	<p>AMEND Rule 3.11.5.5 and the nitrogen reference years to allow long term averaging of nitrogen losses should the Nitrogen Reference Point be continued with.</p> <p>AND AMEND PPC1 to consider alternative tools such as the natural capital approach and Waikato Regional Council's MENU's.</p> <p>AND AMEND PPC1 so that outputs from the OVERSEER Model are used as a guide to decision-making only.</p> <p>AND undertake an industry wide capability assessment to assess who will complete the Farm Environment Plans.</p> <p>AND show landowners and industry how Farm Environment Plans will be constructed and how the gains will be quantified.</p> <p>AND AMEND PPC1 to provide clarity on how the monitoring of Farm Environment Plans will be undertaken and who will pay for it.</p>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-4111	Oppose the provision	<p>AMEND Rule 3.11.5.6 and the nitrogen reference years to allow long term averaging of nitrogen losses should the Nitrogen Reference Point be continued with</p> <p>AND AMEND PPC1 to consider alternative tools such as the natural capital approach and MENU's</p> <p>AND AMEND PPC1 so that outputs from the OVERSEER Model are used as a guide to decision-making only.</p>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13121	Oppose the provision	<p>Rule 3.11.5.6 - undertake an industry wide capability assessment to assess who will complete the Farm Environment Plans</p> <p>AND show landowners and industry how Farm Environment Plans will be constructed and how the gains will be quantified</p> <p>AND AMEND PPC1 to provide clarity on how the monitoring of Farm Environment Plans will be undertaken and who will pay for it.</p>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13122	Oppose the provision	<p>AMEND Rule 3.11.5.6 to provide a unified approach to time-frames and the content of consents issued.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-4112	Oppose the provision	<p>AMEND Rule 3.11.5.7 and the nitrogen reference years to allow long term averaging of nitrogen losses should the Nitrogen Reference Point be continued with</p> <p>AND AMEND PPC1 to consider alternative tools such as the natural capital approach and MENU's</p> <p>AND AMEND PPC1 so that outputs from the OVERSEER Model are used as a guide to decision-making only</p> <p>AND AMEND Rule 3.11.5.7 so that any change in land use is limited by an appropriate means of gauging a best practice approach to managing losses rather than limiting land use change full stop</p> <p>AND undertake an industry wide capability assessment to assess who will complete the Farm Environment Plans</p> <p>AND show landowners and industry how Farm Environment Plans will be constructed and how the gains will be quantified</p> <p>AND AMEND PPC1 to provide clarity on how the monitoring of Farm Environment Plans will be undertaken and who will pay for it.</p>
Schedule B - Nitrogen Reference Point	PC1-4113	Oppose the provision	<p>AMEND Schedule B and the nitrogen reference years to allow long term averaging of nitrogen losses should the Nitrogen Reference Point be continued with.</p> <p>AND AMEND PPC1 to consider alternative tools such as the natural capital approach and Waikato Regional Council's MENU's.</p> <p>AND AMEND PPC1 so that outputs from the OVERSEER Model are used as a guide to decision-making only.</p>
Schedule C - Stock exclusion	PC1-4121	Oppose the provision with amendments	<p>AMEND Schedule C so that the implications of stock exclusion on steeper hill country are considered in more depth.</p> <p>AND AMEND Schedule C so that the fencing is required as a result of an assessment of the potential risk factors and fencing is done in order of priority.</p> <p>AND AMEND Schedule C so that consideration is given to alternative solutions on steep land, such as water reticulation installation.</p> <p>AND AMEND Schedule C so that consideration is given to matching stock exclusion to land use capability rather than directly to slope.</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-4123	Oppose the provision with amendments	<p>Schedule 1: CONSIDER undertaking an industry wide capability assessment to assess who will complete the Farm Environment Plans.</p> <p>AND AMEND to clarify to landowners and industry how Farm Environment Plans will be constructed and how the gains will be quantified.</p> <p>AND AMEND to provide clarity on how the monitoring of Farm Environment Plans will be undertaken and who will pay for it.</p>

## Tirohanga Settlers and Sports Association

Submitter ID: 71751

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-7052	Support the provision with amendments	AMEND Objective 1 by clearly presenting science around freshwater quality in a way that can be followed by the communities in the catchment. AND AMEND by making the water quality targets clearer and easy to understand. AND AMEND by considering phosphorus over nitrogen and drop or revamp OVERSEER to adequately measure this.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-7076	Support the provision	AMEND PPC1 by providing more flexibility in terms of time frame (short term 20 years, long term 100 years). AND AMEND by setting the water quality standard to 'wadeable' rather than 'swimmable' as central government has recommended would be a much more realistic target. AND AMEND by providing a plan where everyone is treated equally.
Objective 3: 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	PC1-7083	Oppose the provision with amendments	AMEND Objective 3 by ensuring point source consent holders are required to make reductions in pollutants at the same rate and within the same time frame as diffuse source land users.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-7087	Oppose the provision with amendments	AMEND so that PPC1 and its rules apply equally to all sectors.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-7092	Support the provision with amendments	No specific decision sought for Policy 4.
Policy 6: Restricting land use change	PC1-7094	Support the provision with amendments	AMEND Policy 6 to cancel the Certificate of Compliance. AND AMEND Policy 6 to treat everyone the same.
Policy 7: Preparing for allocation in the future	PC1-7097	Oppose the provision with amendments	AMEND Policy 7 to treat everyone the same AND AMEND Policy 7 so that any future activity that could affect the four contaminants of the river is publicly notified.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-7101	Oppose the provision	No specific decision sought for Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-7102	Oppose the provision with amendments	AMEND Policy 10 to ensure that all polluters and all sectors contribute equally to reducing pollution and the costs of improvements and reductions are borne by those causing the problem. AND AMEND by providing provision for the treatment and proper disposal of runoff from gutters/streets.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-7098	Oppose the provision with amendments	AMEND Policy 16 to treat everyone the same.

## Tongariro Taupo Conservation Board

Submitter ID: 74060

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-5171	Support the provision	RETAIN stock exclusion from water bodies, setbacks and riparian planting.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-4871	Support the provision	RETAIN Rule 3.11.5.2 (4)(c).
Schedule C - Stock exclusion	PC1-4869	Support the provision	RETAIN Schedule C stock exclusion from water bodies, setbacks and riparian planting.
Schedule 1 - Requirements for Farm Environment Plans	PC1-4870	Support the provision with amendments	RETAIN Schedule 1 stock exclusion from water bodies, setbacks and riparian planting. AND AMEND Schedule 1 (2)(a)(ii) so cattle, horses, deer and pigs are not able to be grazed on land over 25 degrees (this does not include small steep areas within a paddock) but exclude sheep, and horses that are being ridden or led.

## Torstonson, Shayne Kingsley

Submitter ID: 73508

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-8657	Oppose the provision	No specific decision sought for Rule 3.11.5.7.
Schedule B - Nitrogen Reference Point	PC1-8659	Oppose the provision	No specific decision sought for Schedule B.
Schedule C - Stock exclusion	PC1-8660	Oppose the provision	No specific decision sought for Schedule C.
Schedule 1 - Requirements for Farm Environment Plans	PC1-8658	Oppose the provision	No specific decision sought for Schedule 1.

## TOTI Trust

Submitter ID: 74186

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4780	Oppose the provision with amendments	CONSIDER reviewing both PPC1 and the implementation proposals to develop and reach consensus on a new plan - plus a more robust implementation approach.
Schedule 1 - Requirements for Farm Environment Plans	PC1-4779	Support the provision with amendments	AMEND Schedule 1 to establish an 'outcomes' model with remediation options based on best practice and the promotion of specific property examples AND continue exploring new models.

## Townshend, Brenna

Submitter ID: 73791

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-5172	Oppose the provision	AMEND PPC1 to provide for a sub-catchment approach.
Policy 6: Restricting land use change	PC1-5169	Oppose the provision	No specific decision was requested for Policy 6.
3.11.5 Rules	PC1-5174	Oppose the provision	No specific decision was requested for 3.11.5 Rules (general).
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-5170	Oppose the provision	No specific decision was requested for Rule 3.11.5.7.

## Townshend, Gary

Submitter ID: 72877

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-9892	Oppose the provision	No specific decision sought for PPC1.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-9890	Oppose the provision	AMEND Rule 3.11.5.7 to ensure farming is a discretionary activity.
Schedule B - Nitrogen Reference Point	PC1-9885	Oppose the provision	DELETE Schedule B.
Schedule C - Stock exclusion	PC1-9889	Oppose the provision	AMEND Schedule C to enable temporary crossing of waterways by animals.

## Townshend, Scott Mark

Submitter ID: 72617

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7690	Oppose the provision	AMEND PPC1 to ensure a genuinely balanced approach to social, cultural, economic and environmental factors AND AMEND it to place equal balance on requiring action from both rural and urban members of the community AND AMEND PPC1 to adopt a sub-catchment approach.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-7689	Oppose the provision	DELETE Rule 3.11.5.7 AND MAKE land use change a Restricted Discretionary Activity.
Schedule B - Nitrogen Reference Point	PC1-7686	Oppose the provision	REMOVE Schedule B.
Schedule C - Stock exclusion	PC1-7688	Oppose the provision	AMEND Schedule C to enable temporary crossing of waterways by animals.

## Transom, Andrew James

Submitter ID: 73695

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-8468	Support the provision with amendments	AMEND Schedule B to provide for people/farms to submit an individual case regarding stocking rates. OR AMEND Schedule B to provide a blanket stocking rate per hectare based on land class.

## Treloar, David Leslie

Submitter ID: 71543

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-1212	Oppose the provision	No specific decision was requested for PPC1, however the submission notes that all New Zealand citizens and visitors should help contribute to the clean-up and city and town council discharges should be made accountable.

# Treweek, Glen

Submitter ID: 72747

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-5758	Support the provision	RETAIN Objective 1.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-5760	Support the provision	RETAIN Objective 2.
Objective 3: 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	PC1-5761	Support the provision with amendments	AMEND Objective 3 to read: "...Actions put in place and implemented by <del>2016</del> <u>10 years from the Plan becoming operative</u> to reduce discharges..."
Objective 4: People and community resilience	PC1-5763	Support the provision	RETAIN Objective 4.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12660	Support the provision with amendments	AMEND Policy 1 to read: "...c. Progressively excluding... wetlands and lakes, <u>where practical to do so.</u> "
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-5769	Support the provision with amendments	AMEND Policy 1 to read: "Manage <del>and require reductions in</del> 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 <del>provided those discharges do not increase</del> ; and ...."
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12944	Support the provision with amendments	AMEND Policy 2 so commercial vegetable production is captured in Policy 2 requirements AND AMEND address the concerns in this submission about Policy 3 commercial vegetable production requirements in Policy 2.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-5772	Support the provision with amendments	AMEND Policy 2 to read: "Policy 2: Tailored approach to <del>reducing</del> <u>managing</u> diffuse discharges... Manage <del>and require reduction in</del> sub-catchment-wide diffuse discharges of nitrogen, phosphorus, ... enterprises by: a. Taking a tailored, risk based approach to define mitigation actions on the land that will <del>reduce</del> <u>manage</u> diffuse discharges ... c. Establishing a <del>Nitrogen Reference Point</del> <u>Reference Land-use Description</u> for the property or enterprise; and d. Requiring the degree of reduction <u>(if any)</u> in diffuse discharges ... proportionate to the amount of <del>current</del> discharge <u>during the Reference Land-use Description period</u> ... of the water quality improvement <u>(if any)</u> required ...; and e. Requiring <u>a plan for stock exclusion to be implemented completed within 3 years following the</u>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<u>dates which a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026 in accordance with the risk based assessment made during the Farm Environment Plan process; and</u> <u>f. Requiring all farms to implement Good Management Practices."</u>
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-5775	Oppose the provision	DELETE Policy 3. AND AMEND Policy 2 so commercial vegetable production is captured in Policy 2 requirements. AND AMEND to address concerns in this submission about commercial vegetable production requirements in Policy 2.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-5776	Support the provision with amendments	AMEND Objective 3 to read: "...Actions put in place and implemented <del>by 2016</del> <u>10 years from the Plan becoming operative</u> to reduce discharges..." (Policy 4)
Policy 5: Staged approach	PC1-5777	Support the provision	RETAIN Policy 5.
Policy 6: Restricting land use change	PC1-5778	Support the provision with amendments	AMEND Policy 6 to read: "Policy 6: Restricting land use change/translation <u>With regard to the sensitivity of the receiving water body to each of the diffuse contaminants, nitrogen, phosphorus, sediment or microbial pathogens, and except</u> <del>Except</del> as provided in Policy 16... 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. <u>Land use change consent applications that demonstrate an increase in a particular diffuse contaminant (nitrogen, phosphorus, sediment or microbial pathogens), will generally be granted if the receiving water body has capacity to accept that contaminant, or if the proposed land use change application is for a low-level contaminant discharge activity and substantial headroom has been created by reductions made by moderate to high discharge contaminant activities in the same sub-catchment or catchment."</u>
3.11.4.3 Farm Environment Plans	PC1-5779	Support the provision with amendments	AMEND Method 3.11.4.3 to read: "...Waikato Regional Council ... for professionals to <del>develop, certify and monitor</del> <u>audit</u> Farm Environment Plans in a consistent approach across the region. A Farm Environment Plan <del>will be prepared by a certified person as per the requirements outlined in Schedule 1, and</del> <u>will assess the risk of diffuse discharges..."</u>
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-5783	Support the provision with amendments	AMEND Rule 3.11.5.1 to read: "...The use of land for farming activities ( <del>excluding commercial vegetable production</del> ) and the associated ... conditions: <del>1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</del> <del>2. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and</del> <del>Either:</del> <del>3.1. The property area is less than or equal to 4.110 hectares for commercial vegetable production, or less than or equal to 40 hectares for all other farming operations.; and</del>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>4. The farming activities do not form part of an enterprise being undertaken on more than one property; or Where the property area is greater than 4.1 hectares;</p> <p>5. For grazed land, the stocking rate of the land is less than 6 stock units per hectare; and</p> <p>6. No arable cropping occurs; and</p> <p>7. The farming activities do not form part of an enterprise being undertaken on more than one property.</p> <p>5-2. For all properties greater than 4-120 hectares, but less than 40 hectares, (excluding commercial vegetable production), from 31 March 2019, in addition to the requirements of Schedule A, the following information must be provided to the Waikato Regional Council by 1 September each year recorded:</p> <p>a. Annual ..."</p>
<p>3.11.5.2 Permitted Activity Rule – Other farming activities</p>	<p>PC1-5784</p>	<p>Support the provision with amendments</p>	<p>AMEND Rule 3.11.5.2 to read:</p> <p>"Rule 3.11.5.2 - <del>Permitted</del>Discretionary Activity Rule ...</p> <p>The use of land for farming activities (<del>excluding commercial vegetable production</del>) and the ... area is greater than 4-110 hectares for commercial vegetable activities, or greater than 40 hectares for all other farming activities , and has more than 6 stock units per hectare or is used for arable cropping is a <del>permitted</del>discretionary activity ...:</p> <ol style="list-style-type: none"> <li>1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</li> <li>2. A Farm Environment Plan has been prepared for the property in accordance with Schedule 1; and</li> <li>2. Cattle, horses, deer and pigs are excluded from water bodies in conformance with <del>Schedule C and Conditions 3(e) and 4(e) of this Rule</del>the risk based assessment and subsequent targets contained in the Farm Environment Plan; and</li> <li>3-Where the property area is less than or equal to 20 hectares;             <ol style="list-style-type: none"> <li>a. The farming activities do not form part of an enterprise being undertaken on more than one property; and</li> <li>b. Where the land is:                 <ol style="list-style-type: none"> <li>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</li> <li>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</li> <li>c. Upon request, the land owner shall obtain and provide to the Council independent verification from a Certified Farm Environment Planner that the use of land is compliant with either b)(i) or b)(ii) above; and</li> <li>d. Upon request from the Council, a description of the current land use activities shall be provided to the Council; and</li> <li>e. 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);</li> </ol> </li> </ol> </li> <li>4. Where the property or enterprise area is greater than 20 hectares;             <ol style="list-style-type: none"> <li>a. A Nitrogen Reference PointReference Land-use description is produced for the property or</li> </ol> </li> </ol>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			enterprise in conformance with Schedule B; and b. The diffuse discharge of nitrogen from the property or enterprise does not exceed 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 Farming activities have not deviated substantially from those described in the Reference Land-use description, as assessed by a certified Farm Environment Plan Auditor; and c. No part of the property or enterprise over 15 degrees slope is cultivated or grazed; and d. No winter forage crops greater than 20 ha in area are grazed in situ; and e. Where the ... C: i. There shall ...; and ii. New fences installed after 22 October 2016 this plan is made operative must be located ...; and... <u>...Resource consent has been granted with the specified timeframes:</u> <u>1. Three years after this Plan is made operative for properties or enterprise in Priority 1 sub-catchment listed in Table 3.11-2, and properties or enterprise with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</u> <u>2. Five years after this plan is made operative for properties or enterprise in Priority 1 sub-catchment listed in Table 3.11-2;</u> <u>3. Eight years after this plan is made operative for properties or enterprise in Priority 1 sub-catchment listed in Table 3.11-2; Subject to the following conditions:"</u>
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-5787	Support 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 commercial vegetable production) where the land in use is registered to a certified Industry Scheme... is a permitted activity subject to the following conditions:"
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-5788	Oppose the provision with amendments	DELETE Rule 3.11.5.4.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-5790	Oppose the provision	DELETE Rule 3.11.5.5.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-5791	Support the provision	Rule 3.11.5.6 - Not Stated
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-5793	Support the provision with amendments	AMEND Rule 3.11.5.7 to accommodate the changes the submission has sought for Rules 3.11.5.1 to 3.11.5.4.
Schedule A - Registration with Waikato Regional Council	PC1-5794	Support the provision with amendments	REMOVE reference in Schedule A to areas greater than 2 hectares AND REPLACE with areas greater than 10 hectares used for commercial vegetable production, or 40 hectares for all other farming activities

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND Schedule A (1) to read. "1. Registration must occur <del>between 1st September 2018 and 31 March 2019</del> within two years of this plan being made operative."
Schedule B - Nitrogen Reference Point	PC1-5796	Oppose the provision	DELETE Schedule B. AND REPLACE with a schedule describing the requirements of a Reference Land-use Description.
Schedule C - Stock exclusion	PC1-5798	Support the provision with amendments	AMEND Schedule C to provide for a long-term staged approach to stock exclusion, using the Farm Environment Plan and Audit process. AND AMEND so that the most sensitive water bodies are targeted first for stock exclusion.
Schedule 1 - Requirements for Farm Environment Plans	PC1-5800	Support the provision with amendments	DELETE Schedule 1 reference to OVERSEER nutrient budgets. AND DELETE Schedule 1 (e) and Schedule 1 (5). ADD references AND MAKE amendments, where appropriate, to accommodate the Industry-agreed Good Management Practices relating to water quality (September 2015).
Schedule 2 - Certification of Industry Schemes	PC1-5805	Support the provision with amendments	AMEND Schedule 2 to remove the requirement for Farm Environment Plans to be completed by a suitably qualified person. AND ADD provision for Farm Environment Plan Auditor certification.
Additions to Glossary of Terms	PC1-5807	Support the provision with amendments	DELETE from Glossary of Terms the definition for a Nitrogen Reference Point AND ADD a definition for a Reference Land-use Description.
Definition - Nitrogen Reference Point	PC1-13140	Support the provision with amendments	DELETE from Glossary of Terms the definition for a Nitrogen Reference Point AND ADD a definition for a Reference Land-use Description.

## Trinity Lands Ltd

Submitter ID: 72608

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-9751	Oppose the provision	No specific decision sought for PPC1.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-9752	Support the provision with amendments	AMEND Objective 1/Table 3.11-1 water quality attributes to internationally acceptable levels: E coli 95% less than 1000/100ml; nitrate annual median less than 2mg/litre; water clarity at 1 metre at times of annual return low flow; and phosphorus less than 20mg/1000 litres.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-9755	Support the provision with amendments	AMEND PPC1 so that it balances the protection of both the river and the socio-economic viability of regional communities AND CONSIDER the modelled Scenario 3 as a more acceptable solution for balancing people, economy and environment and for achieving the requirements of the National Policy Statement for Freshwater Management AND AMEND Table 3.11-1 to what is achievable under Scenario 3 Modelling.
Objective 4: People and community resilience	PC1-9758	Oppose the provision	AMEND PPC1 to ensure this generation and the next have a future in primary production and growing food for ourselves and the world in a sustainable manner and to consider agriculture as an essential part of our national prosperity AND REMOVE Objective 4(b).



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-9761	Support the provision with amendments	AMEND Policy 1 (b) to read "...b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges; and..."
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-9763	Support the provision	No specific decision sought for Policy 2.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-9764	Oppose the provision	REMOVE Policy 3(b) AND REMOVE all PPC1 provisions that limit the production of freshly grown produce for the domestic market AND AMEND to provide for education of the commercial vegetable production sector on nutrient and water efficiency to maintain yield at optimum efficiency levels.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-9766	Support the provision with amendments	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..."
Policy 6: Restricting land use change	PC1-9767	Oppose the provision	DELETE Policy 6 AND REPLACE it with " <u>Land use change will be a Permitted Activity subject to Farm Environment Plans that can demonstrate the environment is not negatively impacted by this change.</u> "
Policy 8: Prioritised implementation	PC1-9770	Support the provision	No specific decision sought for Policy 8.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-9771	Support the provision	No specific decision sought for Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-9772	Support the provision	No specific decision sought for Policy 10.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-9773	Support the provision	No specific decision sought for Policy 11.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-9774	Support the provision	No specific decision sought for Policy 12.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-9775	Oppose the provision	DELETE Policy 16.
3.11.4.2 Certified Industry Scheme	PC1-9776	Support the provision with amendments	AMEND Method 3.11.4.2 to provide information on criteria for certifying industry schemes by 22 October 2017.
3.11.4.3 Farm Environment Plans	PC1-9777	Support the provision with amendments	AMEND Method 3.11.4.3 to make provision for landholders to appeal their Farm Environment Plans.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-9778	Support the provision with amendments	AMEND Rule 3.11.5.3 to provide clarity, systems and checks and balances for certification and running of Farm Environment Plan mechanisms.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-9779	Oppose the provision	REMOVE Rule 3.11.5.5(f), 3.11.5.5(g) and 3.11.5.5 Matters of Control (ii).
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-9780	Support the provision	No specific decision sought for Rule 3.11.5.6.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-9781	Oppose the provision	AMEND Rule 3.11.5.7 to make it a Permitted Activity subject to showing land use change is neutral and/or will reduce the discharge of nutrients into the river system AND AMEND to allow for offsetting that brings in land more suitable for primary production and retires other land of higher risk in its place AND DELETE Rule 3.11.5.7 AND AMEND PPC1 to make land use change a Permitted Activity subject to a Farm Environment Plan that complies with the restriction of nutrient loss with no net change of diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens across an enterprise AND AMEND Rule 3.11.5.7 to make existing multiple land use change within a property a Permitted Activity under the control of a Farm Environment Plan.
Schedule B - Nitrogen Reference Point	PC1-9782	Oppose the provision	AMEND Schedule B(f) reference period to allow the Nitrogen Reference Point to be calculated from any year from 2011 to 2016 at landholders discretion.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-9754	Support the provision with amendments	AMEND Objective 1 Table 3.11-1 water quality attributes to internationally acceptable levels: E coli 95% less than 1000/100ml; nitrate annual median less than 2mg/litre; water clarity at 1 metre at times of annual return low flow; and phosphorus less than 20mg/1000 litres. AND AMEND Table 3.11-1 to reflect what is achievable under Scenario 3 Modelling

## Trustees of Highfield Deer Park

Submitter ID: 73932

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-3884	Support the provision	RETAIN Objective 2.
Objective 3: Short-term improvements in water quality in the	PC1-3885	Oppose the provision with amendments	AMEND Objective 3 to acknowledge that the short term goals may not be measurable within the 10 year timeframe.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit			AND AMEND by changing timeframes in Table 3.11-1 to a more realistic date.
Objective 4: People and community resilience	PC1-3886	Oppose the provision with amendments	AMEND Objective 4 and reasons to resolve lack of clarity.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-3909	Support the provision with amendments	AMEND Policy 1 (a) to read: "Enabling activities with a low level of contaminant discharge to water bodies provided those discharges do not <del>increase</del> <u>exceed the sub-catchment average</u> ;" AND AMEND Policy 1 (b) to read: "Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges <u>to the sub-catchment average</u> ;"
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-3944	Support the provision with amendments	CONSIDER undertaking further investigation into the affordability and achievability of fencing for stock exclusion within the required timeframe stated in Policy 2 (e).
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-3950	Support the provision with amendments	AMEND Policy 4 to read: " <u>Acknowledge farming units with exceptionally low Nitrogen Reference Points (based on 2014 to 2016 data) and allow for some increase in nitrogen leaching based on a sub-catchment average allowable discharge.</u> "
Policy 6: Restricting land use change	PC1-3953	Oppose the provision with amendments	AMEND Policy 6 by redrafting it into two separate policies and offer more clarity and guidance for the basis on which an application for consent might be declined or approved.
Policy 7: Preparing for allocation in the future	PC1-3963	Oppose the provision with amendments	AMEND Policy 7 by incorporating land suitability criteria into the first paragraph. AND AMEND to provide an exception to the criteria where outcomes may undermine the financial viability of a farming unit.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-3976	Support the provision with amendments	AMEND Policy 9(a) to include reference to territorial authorities as a stakeholder.
Policy 10: Provide for point source discharges of regional significance	PC1-3978	Support the provision with amendments	AMEND Policy 10 to include definitions for 'regionally significant industry' and 'regionally significant infrastructure' or reference to the Waikato Regional Policy Statement definitions.
3.11.4.5 Sub-catchment scale planning	PC1-3982	Support the provision with amendments	AMEND Method 3.11.4.5 clause (a) to include the establishment of a contaminant discharge average based on sub-catchment attributes, contamination issues and potential for appropriate mitigation.
3.11.4.6 Funding and implementation	PC1-3988	Support the provision	No specific decision sought for Method 3.11.4.6.
3.11.4.7 Information needs to support any future allocation	PC1-3989	Support the provision	AMEND 3.11.4.7 so that this method applies to the first phase of regulation of diffuse discharge, and be adjusted based on new information and innovation for future discharges. AMEND so that Nitrogen Reference Points are based on an appropriate sub-catchment average contaminant discharge level while more in-depth information is being collected.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-3993	Support the provision with amendments	AMEND Rule 3.11.5.2.4(b)(ii) to delete the last sentence; AND DELETE Rule 3.11.5.2.4(c);

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND 3.11.5.2.4(e)(ii) to be consistent with the fencing requirements under Schedule C (2). AND AMEND by permitting grazing and/or cultivation on land greater than 15 degrees where fencing requirements have been met and measured, and put in place to mitigate nutrient and sediment runoff.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-4026	Support the provision with amendments	AMEND Rule 3.11.5.4 to reconsider the requirement for the certified industry scheme until the industry is established.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-4027	Oppose the provision	AMEND Rule 3.11.5.7 activity status to discretionary.
Schedule A - Registration with Waikato Regional Council	PC1-4028	Support the provision	No specific decision sought for Schedule A.
Schedule B - Nitrogen Reference Point	PC1-4030	Oppose the provision with amendments	AMEND Schedule B by developing a more appropriate modelling tool. AND AMEND to include flexibility for properties with low Nitrogen Reference Points where this may make future farming operations on those unviable.
Schedule C - Stock exclusion	PC1-4037	Not stated	AMEND Schedule C by providing a definition for 'stream bed'. AND AMEND by allowing an extension of the deadline where financial hardship prevents compliance.
Schedule 1 - Requirements for Farm Environment Plans	PC1-4038	Oppose the provision with amendments	AMEND Schedule 1 2(b)(ii) by changing the word 'lass' to 'less'.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-4075	Oppose the provision with amendments	AMEND Objective 3 to acknowledge that the short term goals may not be measurable within the 10 year timeframe. AND AMEND by changing timeframes in Table 3.11-1 to a more realistic date.

## Tuakau Proteins Limited

Submitter ID: 73915

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-3347	Support the provision with amendments	REPLACE (Policy 3) references to 'Best Management Practice' and 'Good Management Practice' with "Best practicable option (BPO)" OR, if necessary, AMEND the definition of BPO to include as a Schedule to the Plan, Waikato Regional Council's guidance material as representing BPO in respect of diffuse source discharges.
Policy 10: Provide for point source discharges of regional significance	PC1-3321	Support the provision with amendments	AMEND PPC1 to include the following definition: <u>"Regionally significant industry - means industry 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>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<u>a) Dairy manufacturing sites;</u> <u>b) Meat processing plants and rendering plants;</u> <u>c) Pulp and paper processing plants; and</u> <u>d) Mineral extraction activities"</u>
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-3331	Support the provision with amendments	AMEND Policy 11 and any related schedules and objectives to avoid any interpretation that the obligation to avoid, remedy or mitigate the adverse effects of a point source discharge is greater than or extends beyond application of the Best Practicable Option as determined at the time an approval is obtained.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-3333	Support the provision	No specific decision sought for Policy 12.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-3348	Support the provision with amendments	REPLACE (Policy 16) references to 'Best Management Practice' and 'Good Management Practice' with "Best practicable Option (BPO)" OR, if necessary, AMEND the definition of BPO to include as a Schedule to the Plan, Waikato Regional Council's guidance material as representing BPO in respect of diffuse source discharges.
3.11.4.2 Certified Industry Scheme	PC1-3350	Support the provision with amendments	REPLACE 3.11.4.2 throughout PPC1 'Certified Industry Scheme' with 'Certified Sector Scheme'.
Additions to Glossary of Terms	PC1-3339	Support the provision with amendments	AMEND PPC1 to include the following definition: <u>"Regionally significant industry - means industry 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 and rendering plants;</u> <u>c) Pulp and paper processing plants; and</u> <u>d) Mineral extraction activities."</u> AND REPLACE throughout PPC1 'Certified Industry Scheme' with 'Certified Sector Scheme'.

## Tuaropaki Trust

Submitter ID: 73769

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-3007	Support the provision with amendments	AMEND PPC1 to provide the ability for land use change within an enterprise, within the bounds of a total nutrient load without this being constrained by a Non-Complying Activity status rule. AND AMEND to ensure that the principle of 'existing commitment to sustainability' be used to test the current, and future Plan Change(s) against perverse outcomes for operations that are already demonstrating a commitment to environmental sustainability. AND AMEND to clarify the definition of 'swimmable' and 'able to take food from', and confirmation that these definitions have, in fact, formed the basis of PPC1 development.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>If not, AMEND to assess the additional level of impost above that is actually required and appropriate adjustment to the regime as required.</p> <p>AND AMEND to ensure regular reporting by the Waikato Regional Council on these measurable objectives.</p> <p>AND AMEND to take into account sub-catchment characteristics when addressing definitions and standards.</p> <p>AND AMEND to ensure the issue relating to intellectual property is acknowledged by Waikato Regional Council and a process is developed to ensure commercially sensitive information is protected from public disclosure.</p> <p>AND CONSIDER the likely impacts of PPC1 against the full range of national policy direction and provide a review, to ensure that in meeting the environmental outcomes driven by the Vision and Strategy, the achievement of other equally important objectives are not being unnecessarily inhibited.</p>
Use values - Mahinga kai	PC1-3017	Not stated	<p>CLARIFY the definition of 'swimmable' and 'able to take food from' in the Vision and Strategy AND confirm that these definitions have, in fact, formed the basis of PPC1 development. If not, then assess the additional level of impost above that is actually required and appropriate adjustment to the regime as required</p> <p>AND AMEND to ensure regular reporting by the Waikato Regional Council on these measurable objectives</p> <p>AND AMEND to take into account sub-catchment characteristics when addressing definitions and standards.</p>
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-3018	Not stated	<p>CLARIFY the definition of 'swimmable' and 'able to take food from'. Objective 1 AND CONFIRM that these definitions have, in fact, formed the basis of PPC1 development. If not, THEN ASSESS the additional level of impost above that is actually required and appropriate adjustment to the regime as required.</p> <p>AND AMEND to ENSURE regular reporting by the Waikato Regional Council on these measurable objectives.</p> <p>AND AMEND to take into account sub-catchment characteristics when addressing definitions and standards.</p>
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-6371	Support the provision	ADD a Controlled Activity rule to provide a more efficient pathway to give effect to Policy 16.
Reasons for adopting Objective 4	PC1-3014	Not stated	REMOVE any pre-judgement on the basis of future allocation mechanisms. Reasons for adopting Objective 4
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-3036	Support the provision	ADD a Controlled Activity rule to provide a more efficient pathway to give effect to Policy 16.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-3027	Oppose the provision with amendments	REMOVE from Rule 3.11.5.5 glasshouse/covered grown vegetables from the definitions and allow for increases in growing area through a more permissive pathway, such as a Permitted Activity rule

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND provide an alternate pathway to allow research facilities for the collection, protection, maintenance and multiplication of cultivars to be provided for as a Permitted Activity.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-3009	Oppose the provision with amendments	AMEND Rule 3.11.5.7 to provide the ability for land use change within an enterprise, within the bounds of a total nutrient load without this being constrained by a Non-Complying Activity status rule. AND ADD a permitted activity rule that provides for intra-enterprise land use change within the bounds of a net enterprise contaminant loss limit. AND REMOVE glasshouse/covered grown vegetables from the definitions and allow for increases in growing area through a more permissive pathway, such as a Permitted Activity rule. AND AMEND to provide an alternate pathway to allow research facilities for the collection, protection, maintenance and multiplication of cultivars to be provided for as a Permitted Activity. AND ADD a Controlled Activity rule to provide a more efficient pathway to give effect to Objective 5 and Policy 16. AND CONSIDER the likely impacts of PPC1 against the full range of national policy direction and provide a review, to ensure that in meeting the environmental outcomes driven by the Vision and Strategy, the achievement of other equally important objectives are not being unnecessarily inhibited.
Schedule B - Nitrogen Reference Point	PC1-3021	Not stated	RETAIN Schedule B(c) AND RETAIN Schedule B(f) AND CONSIDER a review of the need for, and impacts of, the use of the current version of the OVERSEER Model and AMEND PPC1 as required.
Schedule C - Stock exclusion	PC1-3047	Not stated	CLARIFY Schedule C to use consistent definitions. AND AMEND to ensure cattle, deer, horses and pigs are to be excluded and require stock crossings, and sheep and beef are to be excluded from this requirement.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-3040	Not stated	ADD or AMEND a policy explicitly stating that the intent is not to achieve better than natural water quality levels.
Definition - Commercial vegetable production	PC1-3029	Oppose the provision with amendments	REMOVE glasshouse/covered grown vegetables from the definition for commercial vegetable production.
Definition - Tangata whenua ancestral lands	PC1-3038	Support the provision	RETAIN Definition - Tangata whenua ancestral lands

## Tucker, Geoff and Kara

Submitter ID: 73928

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-2783	Oppose the provision	DELETE the Nitrogen Reference Point.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND DELETE the use of the OVERSEER Model from PPC1. AND ADOPT a sub-catchment approach based on Farm Environment plans.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-2736	Support the provision with amendments	AMEND Objective 1 to align water quality targets with the National Policy Statement on water quality. AND MAKE any consequential amendments.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-2740	Support the provision with amendments	AMEND PPC1 to strengthen provisions protecting the long term cultural, economic and social well-being of our communities. AND MAKE any consequential amendments.
Objective 4: People and community resilience	PC1-2742	Support the provision with amendments	AMEND PPC1 to strengthen provisions protecting the long term cultural, economic and social well-being of our communities. AND DELETE Objective 4 (b). AND MAKE any consequential amendments.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-2767	Oppose the provision with amendments	DELETE the Nitrogen Reference Point. (Policy 2) AND DELETE the use of the OVERSEER Model from PPC1 AND AMEND to enable flexibility in nitrogen emissions from low intensity sheep and beef farming AND MAKE any consequential amendments.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12945	Support the provision with amendments	Policy 2 - ADOPT a sub-catchment approach based on Farm Environment plans, using science to determine which contaminants are an issue in that catchment AND AMEND PPC1 so farm Environment Plans can be produced by the farmer or landowner, with Waikato Regional Council guidance and support AND AMEND Farm Environment Plan requirements to adopt nationally recommended standards around fencing and the upper limit of low intensity agriculture (18 stock units per hectare as at 30 June in any given year).
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-2785	Support the provision with amendments	AMEND PPC1 to align it with the National Policy statement on Freshwater and the waterway definition, slope of land requiring fencing and stocking rate parameters set out in there. AND AMEND to allow individual Farm Environment Plans to offer mitigations appropriate to individual farms and sub-catchments. AND AMEND to include a subsidy for waterway fencing. AND AMEND to give hill country farmers time to show where their water quality presently sites. AND AMEND so that where fencing is required surety is provided that plantation forestry will not be forced by future plan changes. AND MAKE any consequential amendments.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-2788	Support the provision with amendments	AMEND PPC1 to align it with the National Policy statement on Freshwater and the waterway definition, slope of land requiring fencing and stocking rate parameters set out in there. AND AMEND to allow individual Farm Environment Plans to offer mitigations appropriate to individual farms and sub-catchments. AND AMEND to include a subsidy for waterway fencing. AND AMEND to give hill country farmers time to show where their water quality presently sites. AND AMEND so that where fencing is required surety is provided that plantation forestry will not be forced by future plan changes.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND MAKE any consequential amendments.
Policy 6: Restricting land use change	PC1-2749	Oppose the provision	DELETE Policy 6. AND MAKE any consequential amendments.
Policy 7: Preparing for allocation in the future	PC1-2770	Oppose the provision	DELETE the Nitrogen Reference Point in Policy 7. AND DELETE the use of the OVERSEER Model from PPC1. AND ADOPT a sub-catchment approach based on Farm Environment plans, using science to determine which contaminants are an issue in that catchment.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-2805	Oppose the provision	DELETE Policy 16.
3.11.4.5 Sub-catchment scale planning	PC1-2756	Support the provision with amendments	AMEND 3.11.4.5 existing objectives, policies and implementation strategies to enable sub-catchment groups to manage their resources to achieve water quality outcomes following science based processes. AND MAKE any consequential amendments.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-2744	Support the provision with amendments	AMEND Rule 3.11.5.1 so that land uses with a stocking rate at or below 18 stock units per hectare (as at 30 June in any given year) be allowed as a permitted activity. Enable stocking rate to increase or decrease whilst remaining below 18 units/ hectare as proven by a farm Environment Plan at farmers discretion, age, stage of life, etc. AND DELETE any standards or clauses from PPC1 which hold to historic discharge levels or stocking rates AND AMEND PPC1 riparian setback distances and fencing requirements to apply only to land less than 15 degrees in slope AND AMEND PPC1 to align it with the National Policy statement on Freshwater including the waterway definition, slope of land requiring fencing and stocking rate parameters set out in there AND AMEND to allow individual Farm Environment Plans to offer mitigations appropriate to individual farms and sub-catchments AND subsidise waterway fencing AND AMEND to give hill country farmers time to show their current water quality AND AMEND so that where fencing is required, surety is provided that those properties will not be forced into plantation forestry by future plan changes AND AMEND PPC1 so farm Environment Plans can be produced by the farmer or landowner, with Waikato Regional Council guidance and support AND AMEND Farm Environment Plan requirements to adopt nationally recommended standards around fencing and the upper limit of low intensity agriculture (18 stock units per hectare as at 30 June in any given year) AND AMEND to enable flexibility in nitrogen emissions from low intensity sheep and beef farming AND MAKE any consequential amendments.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-2747	Support the provision with amendments	DELETE Rule 3.11.5.2 (4)(c) AND AMEND Rule 3.11.5.2 to read that land uses with a stocking rate at or below 18 stock units per hectare (as at 30 June in any given year) be allowed as a permitted activity. Enable stocking rate to

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>increase or decrease whilst remaining below 18 units/ hectare as proven by a farm Environment Plan at farmers discretion, age, stage of life, etc  AND DELETE any standards or clauses from PPC1 which hold to historic discharge levels or stocking rates  AND AMEND PPC1 riparian setback distances and fencing requirements to apply only to land less than 15 degrees in slope  AND DELETE the Nitrogen Reference Point  AND DELETE the use of the OVERSEER Model from PPC1  AND ADOPT a sub-catchment approach based on Farm Environment plans, use science and water testing to determine which contaminants are an issue in that catchment  AND AMEND PPC1 to align it with the National Policy statement on Freshwater and the waterway definition, slope of land requiring fencing and stocking rate parameters set out in there  AND AMEND to allow individual Farm Environment Plans to offer mitigations appropriate to individual farms and sub-catchments  AND subsidise waterway fencing  AND AMEND to give hill country farmers time to show their current water quality  AND AMEND so that where fencing is required, surety is provided that those properties will not be forced into plantation forestry by future plan changes  AND AMEND PPC1 so farm Environment Plans can be produced by the farmer or landowner, with Waikato Regional Council guidance and support  AND AMEND Farm Environment Plan requirements to adopt nationally recommended standards around fencing and the upper limit of low intensity agriculture (18 stock units per hectare as at 30 June in any given year)  AND AMEND to enable flexibility in nitrogen emissions from low intensity sheep and beef farming  AND MAKE any consequential amendments.</p>
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-2776	Support the provision with amendments	<p>DELETE the Nitrogen Reference Point. (Rule 3.11.5.3)  AND DELETE the use of the OVERSEER Model from PPC1  AND ADOPT a sub-catchment approach based on Farm Environment plans, using science to determine which contaminants are an issue for that catchment  AND AMEND PPC1 to align it with the National Policy statement on Freshwater and the waterway definition, slope of land requiring fencing and stocking rate parameters set out in there  AND AMEND to allow individual Farm Environment Plans to offer mitigations appropriate to individual farms and sub-catchments  AND subsidise waterway fencing  AND AMEND to give hill country farmers time to show where their water quality presently sites  AND AMEND so that where fencing is required surety is provided that plantation forestry will not be forced by future plan changes  AND AMEND PPC1 so farm Environment Plans can be produced by the farmer or landowner, with Waikato Regional Council guidance and support  AND AMEND Farm Environment Plan requirements to adopt nationally recommended standards around fencing and the upper limit of low intensity agriculture (18 stock units per hectare as at 30 June in any given year)</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to enable flexibility in nitrogen emissions from low intensity sheep and beef farming AND MAKE any consequential amendments.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-2777	Oppose the provision with amendments	DELETE the Nitrogen Reference Point. Rule 3.11.5.4 AND DELETE the use of the OVERSEER Model from PPC1 AND ADOPT a sub-catchment approach based on Farm Environment plans, using science to determine which contaminants are an issue in that catchment AND AMEND PPC1 to align it with the National Policy statement on Freshwater and the waterway definition, slope of land requiring fencing and stocking rate parameters set out in there AND AMEND to allow individual Farm Environment Plans to offer mitigations appropriate to individual farms and sub-catchments AND subsidise waterway fencing AND AMEND to give hill country farmers time to show where their water quality presently sites AND AMEND so that where fencing is required surety is provided that plantation forestry will not be forced by future plan changes AND AMEND PPC1 so farm Environment Plans can be produced by the farmer or landowner, with Waikato Regional Council guidance and support AND AMEND Farm Environment Plan requirements to adopt nationally recommended standards around fencing and the upper limit of low intensity agriculture (18 stock units per hectare as at 30 June in any given year) AND AMEND to enable flexibility in nitrogen emissions from low intensity sheep and beef farming AND MAKE any consequential amendments.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-2778	Oppose the provision with amendments	DELETE the Nitrogen Reference Point. Rule 3.11.5.5 AND DELETE the use of the OVERSEER Model from PPC1 AND ADOPT a sub-catchment approach based on Farm Environment plans, using science to determine which contaminants are an issue in that catchment AND AMEND PPC1 so farm Environment Plans can be produced by the farmer or landowner, with Waikato Regional Council guidance and support AND AMEND Farm Environment Plan requirements to adopt nationally recommended standards around fencing and the upper limit of low intensity agriculture (18 stock units per hectare as at 30 June in any given year) AND AMEND to enable flexibility in nitrogen emissions from low intensity sheep and beef farming AND MAKE any consequential amendments.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-2779	Oppose the provision with amendments	DELETE the Nitrogen Reference Point. (Rule 3.11.5.6) AND DELETE the use of the OVERSEER Model from PPC1 AND AMEND to enable flexibility in nitrogen emissions from low intensity sheep and beef farming.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13123	Oppose the provision with amendments	Rule 3.11.5.6 - ADOPT a sub-catchment approach based on Farm Environment plans, using science to determine which contaminants are an issue in the catchment AND AMEND PPC1 so farm Environment Plans can be produced by the farmer or landowner, with Waikato Regional Council guidance and support AND AMEND Farm Environment Plan requirements to adopt nationally recommended standards around fencing and the upper limit of low intensity agriculture (18 stock units per hectare as at 30 June in any given year).

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-2750	Oppose the provision with amendments	DELETE Rule 3.11.5.7 OR DELETE the Nitrogen Reference Point AND DELETE the use of the OVERSEER Model from PPC1 AND ADOPT a sub-catchment approach based on Farm Environment plans, using science and to determine which contaminants are an issue in that catchment AND AMEND PPC1 so farm Environment Plans can be produced by the farmer or landowner, with Waikato Regional Council guidance and support AND AMEND Farm Environment Plan requirements to adopt nationally recommended standards around fencing and the upper limit of low intensity agriculture (18 stock units per hectare as at 30 June in any given year) AND AMEND to enable flexibility in nitrogen emissions from low intensity sheep and beef farming AND MAKE any consequential amendments.
Schedule B - Nitrogen Reference Point	PC1-2781	Oppose the provision	DELETE the Nitrogen Reference Point. Schedule B AND DELETE the use of the OVERSEER Model from PPC1. AND ADOPT a sub-catchment approach based on Farm Environment plans, using science to determine which contaminants are an issue in that catchment.
Schedule C - Stock exclusion	PC1-2794	Support the provision with amendments	AMEND PPC1 to align it with the National Policy statement on Freshwater and the waterway definition, slope of land requiring fencing and stocking rate parameters set out in there. AND AMEND to allow individual Farm Environment Plans to offer mitigations appropriate to individual farms and sub-catchments. AND CONSIDER subsidising waterway fencing. AND MAKE any consequential amendments.
Schedule 1 - Requirements for Farm Environment Plans	PC1-2803	Support the provision with amendments	AMEND Schedule 1 so farm Environment Plans can be produced by the farmer or landowner, with Waikato Regional Council guidance and support AND AMEND Farm Environment Plan requirements to adopt nationally recommended standards around fencing and the upper limit of low intensity agriculture (18 stock units per hectare as at 30 June in any given year) AND MAKE any consequential amendments.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12540	Support the provision with amendments	AMEND Schedule 1 to enable flexibility in nitrogen emissions from low intensity sheep and beef farming.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-2738	Support the provision with amendments	AMEND Table 3.11-1 to align water quality targets with the National Policy Statement on water quality. AND MAKE any consequential amendments.

## Tully, Ciaran

Submitter ID: 71653

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-9655	Oppose the provision with amendments	WITHDRAW PPC1 until the north eastern portion and Waikato River Authority Vision and Strategy is amended. AND AMEND PPC1 to review the full social and economic cost to the community of mitigation and disclose this.
Policy 13: Point sources consent duration	PC1-9663	Support the provision with amendments	AMEND Policy 13 to review all point source discharges e.g. Dams, carp, sewage systems and roads and mitigate appropriately AND AMEND to disclose all point source discharge numbers and costs of mitigations.
Schedule B - Nitrogen Reference Point	PC1-9662	Support the provision with amendments	AMEND Schedule B to put mitigation factors in Farm Environment Plans that covers all discharges (agricultural, point source etc) and reassess Nitrogen Reference Point levels.

## Turangawaewae Marae

Submitter ID: 74173

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-10889	Support the provision	Other than the specific decisions sought in this submission, only undertake amendments to Part A, Part B, Part C and Part D of PPC1 where those amendments will: 1. align with this submission's specific submission points; 2. strengthen and enhance PPC1 to achieve the Vision and Strategy; 3. assist in protecting the Values and achieving the Objectives within PPC1; 4. enable flexibility to achieve (and where possible exceed) water quality objectives of the Vision and Strategy earlier than the 80-year timeframe; 5. protect positive gains in achieving or exceeding water quality targets and maintain momentum to further improve water quality; 6. provide for reviews of PPC1 should water quality objectives not be achieved within the given timeframes; 7. provide appropriate support and resourcing to all sectors of the wider community so that the objectives of PPC1; and 8. align with the Waikato-Tainui Environmental Plan 'Tai Tumu, Tai Pari, Tai Ao' and Whakatapuranga 2050.
3.11.2 Objectives	PC1-12170	Support the provision	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units.</u> <u>Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u> " AND ADD Reasons for adopting Objective 6 to read: " <u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u> "
Objective 1: Long-term restoration and protection of water quality for	PC1-12159	Support the provision with amendments	RETAIN the 80-year timeframe in Objective 1.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
each sub-catchment and Freshwater Management Unit			AND AMEND Objective 1 to read: "By 2096, <u>at the latest, or sooner where practicable</u> , discharges of nitrogen..."
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-12160	Support the provision with amendments	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being and <u>prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being and <u>prosperity</u> ."
Objective 3: 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	PC1-12163	Support the provision	RETAIN Objective 3.
Objective 4: People and community resilience	PC1-12165	Support the provision	RETAIN Objective 4.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-12169	Support the provision	RETAIN Objective 5.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12171	Support the provision	RETAIN Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12173	Support the provision	RETAIN Policy 2.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-12174	Support the provision	RETAIN Policy 3.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-12175	Support the provision	RETAIN Policy 4.
Policy 5: Staged approach	PC1-12179	Support the provision	RETAIN Policy 5.
Policy 6: Restricting land use change	PC1-12181	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 <del>generally</del> not be granted. Land use change consent... that demonstrate <del>clear and enduring</del> <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</u>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<u>temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants."</u>
Policy 7: Preparing for allocation in the future	PC1-12182	Support the provision with amendments	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and <del>any</del> future property or... pathogens that <del>will</del> <u>may</u> be required by... that will assist in <del>defining 'land suitability'</del> <u>preparing any new allocation or management regime</u> . ... c. Minimise social disruption and costs in transition to <del>the 'land suitability'</del> any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability <del>will</del> <u>may</u> consider the following criteria:.. c. the natural capacity of the <del>landscape</del> <u>within a sub-catchment</u> to attenuate contaminant loss; and..."
Policy 8: Prioritised implementation	PC1-12183	Support the provision	RETAIN Policy 8.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-12185	Support the provision	RETAIN Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-12190	Support the provision with amendments	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, <del>provide</del> <u>have regard to the continued operation of:</u> a. <del>Continued operation of</del> regionally significant infrastructure'; and b. <del>Continued operation of</del> regionally significant industry'."
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-12192	Support the provision	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects <del>to</del> <u>from</u> point source discharges... Require any person undertaking a point source discharge... effects of the discharge <del>at the time a resource consent application is decided</del> . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to <del>lessen</del> <u>by offsetting</u> residual adverse effects of the discharge..."
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-12193	Support the provision with amendments	AMEND Policy 12 to read: "Consider the contribution made by a... microbial pathogen <del>catchment</del> loads <u>within a sub-catchment</u> and the impact of that contribution on the <del>likely</del> achievement of the... d. <del>The diminishing return on investment in the treatment plant upgrades in respect of any resultant reduction in nitrogen, phosphorus, sediment or microbial pathogens when treatment plant processes are already achieving a high level of contaminant reduction through the application of the Best Practicable Option*.</del> "
Policy 13: Point sources consent duration	PC1-12194	Support the provision with amendments	AMEND Policy 13 to read: "When determining the... a. <del>A consent term exceeding 25 years, where</del> <u>The applicant demonstrates the approaches...</u> "
Policy 14: Lakes Freshwater Management Units	PC1-12195	Support the provision with amendments	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-12196	Support the provision	RETAIN Policy 16.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-12197	Support the provision	RETAIN Policy 17.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.4 Implementation methods	PC1-12211	Support the provision with amendments	ADD a NEW Method to read: " <u>3.11.4.13 Decision support system</u> <u>The Waikato Regional Council working with regional stakeholders will:</u> <u>a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u> <u>For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located."</u>
3.11.4.1 Working with others	PC1-12198	Support the provision with amendments	AMEND Method 3.11.4.1 to read: " <u>Working with others Waikato and Waipā River Iwi partners and Regional Stakeholders.</u> Waikato Regional Council will work with <u>regional</u> stakeholders including..."
3.11.4.2 Certified Industry Scheme	PC1-12199	Support the provision with amendments	AMEND Method 3.11.4.2 to read: "Certified Industry Scheme... b. Oversight, and monitoring of Farm Environment Plans: c. Information <u>provisions</u> sharing; d. <del>Aggregate</del> <u>Collective</u> reporting on Certified... e. <u>Process for dealing with non-compliance by the Certified Industry Scheme;</u> f. <u>Process for dealing with non-compliance by individual members of the Certified Industry Scheme;</u> <u>and</u> e-g. Consistency across the various Certified Industry Schemes."
3.11.4.3 Farm Environment Plans	PC1-12201	Support the provision with amendments	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation</u> actions to reduce those risks <del>in order</del> to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with <del>more</del> <u>a standardised</u> monitoring <u>programme</u> and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on</u> risk assessment <u>and the outcome of previous monitoring results.</u> <u>Waikato Regional Council will prepare an audit schedule for undertaking robust third party audit (independent of the farmer and Certified Farm Environment Planner) and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans."</u>
3.11.4.4 Lakes and Whangamarino Wetland	PC1-12202	Support the provision with amendments	AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working with <del>others</del> stakeholders, will: a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment.</u> <del>a-b.</del> Build on the Shallow Lakes Management Plan by... <del>b-c.</del> Prepare and implement Lake Catchment Plans with community involvement which include : i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community).</u> "
3.11.4.5 Sub-catchment scale planning	PC1-12203	Support the provision with amendments	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where <del>it has been shown to be required</del> <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently.</u> Sub-catchment planning..."
3.11.4.6 Funding and implementation	PC1-12204	Support the provision	RETAIN Method 3.11.4.6.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.4.7 Information needs to support any future allocation	PC1-11296	Support the provision with amendments	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 by 2026 including: a. ...support the setting of property or enterprise-level diffuse discharge. <del>limits in the future</del> <u>Detailed evaluation of the range of options (including economic instruments) that are available to allocate rights to discharge contaminants from land use.</u> "
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-12205	Support the provision with amendments	AMEND Method 3.11.4.8 to read: "...b. Use <del>this to inform future</del> <u>the best available information to develop</u> changes to the Waikato Regional Plan <u>by 2026</u> to manage discharges..."
3.11.4.9 Managing the effects of urban development	PC1-12207	Support the provision with amendments	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built environment <del>which anticipates and addresses</del> <u>to address the cumulative effect of urban development on water quality</u> over the long-term."
3.11.4.10 Accounting system and monitoring	PC1-12208	Support the provision with amendments	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including <del>biological</del> <u>biological</u> monitoring tools... Community Index <u>and Cultural Health Index</u> to provide the basis for... d. <del>An information</del> <u>A freshwater accounting system that accounts for the diffuse discharges that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at the enterprise or property scale.</u> <u>e. Iwi must be included in the consent process where waters are to be removed from the Waikato or Waipā rivers, for other than domestic use.</u> " AND ENSURE monitoring sites are strictly used for review and research of water quality AND AMEND to ensure Waikato and Waipā River is protected from exploitation.
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-12209	Support the provision with amendments	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. <del>Review and report</del> <u>Report on the progress towards and achievement of the 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.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-12210	Support the provision	RETAIN Method 3.11.4.12.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-12212	Support the provision	RETAIN Rule 3.11.5.1.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-12214	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> "
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm	PC1-12215	Support the provision with amendments	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan <del>provided</del> <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 shall be considered subject to Rule 3.11.5.6.</u> "

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Environment Plan under a Certified Industry Scheme			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.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-12216	Support the provision with amendments	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 <del>undertaking</del> <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 <del>shall be</del> amended..."
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-12222	Support the provision	RETAIN Rule 3.11.5.6.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-12217	Support the provision	RETAIN Rule 3.11.5.7.
Schedule A - Registration with Waikato Regional Council	PC1-12219	Support the provision with amendments	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. <u>A map of the property showing all land parcels</u> c. Legal description of the <u>individual land parcels that comprise the property or enterprise</u> as per the certificate(s) of title... 6. Properties that graze livestock must also provide <del>aan</del> <u>an additional map</u> showing:... ii. <u>Confirmation of water</u> <del>Water</del> bodies listed in Schedule C <u>(and provided by Waikato Regional Council in a map)</u> for stock exclusion within..."
Schedule B - Nitrogen Reference Point	PC1-12220	Support the provision with amendments	AMEND Schedule B to read: "A property or enterprise with a... b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> <del>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months)</del> <u>within the reference period</u> (specified in clause f)... f. The reference period is <u>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)</u> <del>the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable...</del> " AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions:  <ul style="list-style-type: none"> <li>(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>"</li> </ul>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<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 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>
Schedule C - Stock exclusion	PC1-12221	Support the provision with amendments	<p>AMEND Schedule C to read: "Water bodies from which cattle...</p> <p>i. Any river that <del>is</del> <u>continually contains surface water</u> flowing (i.e. that is not identified as an <u>intermittently flowing river</u>).</p> <p>ii. Any drain (<u>including farm drain canal</u>) that continually contains surface water.</p> <p>iii. Any wetland, including a constructed wetland <u>that has a direct connection with continuously flowing surface water.</u>"</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12223	Support the provision with amendments	<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) <del>and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</del></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>i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses <del>from</del> <u>to</u> these areas through...</p> <p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; <u>and</u></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</u>:</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p><u>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. The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</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> <p>iii. <u>Record of audit by independent third party accredited auditor.</u></p> <p>7. A <u>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>8. A <u>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>
Schedule 2 - Certification of Industry Schemes	PC1-12224	Support the provision with amendments	<p>AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System</p> <p>The application must <u>clearly</u> demonstrate that the...</p> <p>a. <del>the achievement of</del>the water quality targets referred to...</p> <p>c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u></p> <p>d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u></p> <p>2. Has an appropriate ownership structure, governance arrangements and management (<u>including capacity and capability to undertake the coordinated management of Farm Management Plans.</u></p> <p>3. Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with <u>external stakeholders.</u></p> <p>4. Has the <u>appropriate resources to achieve its function and responsibilities under 1(a), including monitoring, auditing and reporting.</u></p> <p><del>35.</del> Has documented systems, processes, and...</p> <p>a. Competent and consistent performance in <u>preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></p> <p>b. Effective internal monitoring of performance, <u>including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. Robust data management (<u>both spatial and temporal</u>)...</p> <p>d. ...</p> <p>e. Timely and <del>appropriate</del> <u>detailed</u> reporting, including (but not limited to):</p> <p><u>i. progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>ii. <u>current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></p> <p>f. Corrective actions will be implemented <u>where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></p> <p>g. <u>Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></p> <p>h. Internal quality control and verification.</p> <p>i. The responsibilities <u>and accountability</u> of all parties to the Certified Industry Scheme are clearly stated <u>and enforced</u>...</p> <p>j. An accurate and up to date register of scheme membership is <u>established and maintained</u> ...</p> <p>k. ...</p> <p>l. The articles of the scheme, <u>including its register of membership</u> are available for public viewing.</p> <p>B. People</p> <p>The application must demonstrate...</p> <p>1. <del>Those</del><u>The nominated parties responsible for generating and auditing Farm Environment Plans are Certified Farm Environment Planners suitably qualified and experienced.</u></p> <p>2. Auditing of Farm Environment Plans - <u>prepared under the Certified Industry Scheme - requirements will be undertaken by the parties that are accredited auditors and independent of the Farm...</u></p> <p>c. Farm Environment Plans</p> <p>The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1."</p> <p>Or</p> <p>AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.</p>
<p>Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments</p>	<p>PC1-12161</p>	<p>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 <i>a</i> 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 bottom of each Freshwater Management Unit.</p>
<p>Additions to Glossary of Terms</p>	<p>PC1-12226</p>	<p>Support the provision with amendments</p>	<p>ADD a NEW definition to read: "<u>Intermittently flowing river: Intermittently flowing river means a river or stream that, in its natural state during an average year, stops flowing on at least one occasion during the year.</u>"</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Definition - Enterprise	PC1-12225	Support the provision with amendments	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..."

## Turner, Ross John

Submitter ID: 71029

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-35	Not stated	No decision was requested for PPC1.
Area covered by Chapter 3.11	PC1-29	Support the provision with amendments	AMEND the Area covered by Chapter 3.11/PPC1 to concentrate on the worst areas of the Waikato and Waipā River first.
Collaborative approach	PC1-18	Support the provision with amendments	ADDRESS that the Collaborative approach to developing PPC1 was unbalanced and unfair to farmers.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-30	Support the provision with amendments	AMEND Policy 11 to address Hamilton City and Raglan sewerage spillages and other urban storm water runoff.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-33	Support the provision with amendments	AMEND Table 3.11-1 so that the water standards are the same as UN standards.

## Turton, Francis James

Submitter ID: 73883

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-3750	Oppose the provision	AMEND PPC1 to renegotiate the plan by removing flawed science and impracticable requirements for hill country farmers AND AMEND to adopt a smaller water catchment format and management approaches to identify true water quality and sustainability issues AND AMEND PPC1 by adopting an effects based and targeted approach to ensure that years and generations of practical knowledge and expertise are used to achieve the desired outcome for all AND AMEND to recognise that one size does not fit all AND AMEND to eradicate pest species AND AMEND to ensure all parties and hill country farmers are engaged and achieve the outcome for the catchment and the Vision and Strategy.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Use values - Mahinga kai	PC1-3736	Oppose the provision	AMEND Use values - Mahinga kai, with the consent of the land owner, to be a proposal.
Use values - Commercial, municipal and industrial use	PC1-3739	Oppose the provision	AMEND Use values - commercial, municipal and industrial use to provide for the Waikato Regional Council to invest in systems and infrastructure to stop storm water runoff.
Policy 10: Provide for point source discharges of regional significance	PC1-3740	Oppose the provision	AMEND Policy 10 to provide for the Waikato Regional Council to invest in systems and infrastructure to stop storm water runoff.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-3741	Oppose the provision	AMEND Policy 11 to provide for the Waikato Regional Council to invest in systems and infrastructure to stop storm water runoff.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-3742	Oppose the provision	AMEND Policy 12 to provide for the Waikato Regional Council to invest in systems and infrastructure to stop storm water runoff.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-3554	Oppose the provision	AMEND Rule 3.11.5.1 to prepare a new s32 evaluation with hill country farmers taking a sub-catchment approach and include the Government Clean water package 2017.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-3725	Oppose the provision	AMEND Rule 3.11.5.2 to prepare a new s32 evaluation with hill country farmers taking a sub-catchment approach and include the Government Clean water package 2017 AND AMEND to align the stocking rates with Auckland and Gisborne of 18 winter stock units per hectare.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-3726	Oppose the provision	AMEND Rule 3.11.5.3 to prepare a new s32 evaluation with hill country farmers taking a sub-catchment approach and include the Government Clean water package 2017.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-3729	Oppose the provision	AMEND Rule 3.11.5.4 so that beef and lamb farmers are not aligned with the dairy sector and propose credible science based data and practical solutions for hill country farmers.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-3731	Oppose the provision	AMEND Rule 3.11.5.7 to adopt a sub-catchment approach with up to date technologies and data to develop mitigations to enable farm and business development.
Schedule B - Nitrogen Reference Point	PC1-3743	Oppose the provision	AMEND Schedule B to review a new s32 analysis.
Schedule C - Stock exclusion	PC1-3745	Oppose the provision	CONSIDER a review of Schedule C AND REPLACE with new policy statement for freshwater management 2017.
Schedule 1 - Requirements for Farm Environment Plans	PC1-3746	Oppose the provision	AMEND Schedule 1 to provide for farmers to write their own Farm Environment Plans.

# Tuwharetoa Maori Trust Board

Submitter ID: 73356

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-13171	Not stated	No decision requested for PPC1, however, the submitter has made a joint submission, together with the other Waikato and Waipā River Iwi on PPC1 (the Joint Submission). The submitter endorses and supports the submissions made in the Joint Submission.
General	PC1-13172	Not stated	RETAIN the general direction that is articulated through PPC1 AND RETAIN the increased controls on land use to 'hold the line' and prevent future land use intensification AND RETAIN the staged approach articulated through PPC1.
General	PC1-13173	Not stated	RECOGNISE and account in PPC1 for the contribution of Māori land in offsetting the discharge of contaminants from other developed land, at some stage in the future. AND RECOGNISE the investment made by landowners, particularly the owners of Māori land, to reduce contaminants discharged from land use.
General	PC1-13174	Not stated	No specific decision requested however the submitter notes that of particular importance, is building the capacity and capability of WRC, to give effect to the methods set out in PPC1. The submitter also notes that monitoring the effectiveness of PPC1 will be important to give confidence to the regional community that we are on target to achieving the short term objectives and tracking positively towards achieving Te Ture Whaimana in 80-years.
General	PC1-13175	Not stated	No specific decision requested for PPC1, however the submitter recognises that further plan changes will be required to achieve Te Ture Whaimana within 80 years. The submitter is clear that any future framework for the allocation of rights to discharge contaminants, will not be based on a pure grandparenting approach.
3.11.2 Objectives	PC1-10271	Support the provision	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units.</u> <u>Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u> " AND ADD Reasons for adopting Objective 6 to read: " <u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u> "
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-10256	Support the provision with amendments	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..."
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-10267	Support the provision with amendments	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> is maintained in the long term..."



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> ."
Objective 3: 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	PC1-10268	Support the provision	RETAIN Objective 3.
Objective 4: People and community resilience	PC1-10269	Support the provision	RETAIN Objective 4.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-10270	Support the provision	RETAIN Objective 5.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-10272	Support the provision	RETAIN Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-10273	Support the provision	RETAIN Policy 2.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-10274	Support the provision	RETAIN Policy 3.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-10275	Support the provision	RETAIN Policy 4.
Policy 5: Staged approach	PC1-10279	Support the provision	RETAIN Policy 5.
Policy 6: Restricting land use change	PC1-10297	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 <del>generally</del> not be granted. Land use change consent... that demonstrate <del>clear and enduring</del> <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> "

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 7: Preparing for allocation in the future	PC1-10301	Support the provision with amendments	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and <del>any</del> future property or... pathogens that <del>will</del> may be required by... that will assist in <del>defining 'land suitability'</del> preparing <u>any new allocation or management regime</u> . ... c. Minimise social disruption and costs in transition to the <del>'land suitability'</del> any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability <del>will</del> may consider the following criteria:.. c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."
Policy 8: Prioritised implementation	PC1-10308	Support the provision	RETAIN Policy 8.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-10311	Support the provision	RETAIN Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-10331	Support the provision with amendments	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, <del>provide</del> have regard to the continued operation of: a. <del>Continued operation of</del> regionally significant infrastructure'; and b. <del>Continued operation of</del> regionally significant industry'."
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-10339	Support the provision	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects <del>to</del> from point source discharges... Require any person undertaking a point source discharge... effects of the discharge <del>at the time a resource consent application is decided</del> . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to <del>lessen any</del> by <u>offsetting</u> residual adverse effects of the discharge..."
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-10343	Support the provision with amendments	AMEND Policy 12 to read: "Consider the contribution made by a... microbial pathogen <del>catchment</del> loads <u>within a sub-catchment</u> and the impact of that contribution on the <del>likely</del> achievement of the... <del>d. The diminishing return on investment in the treatment plant upgrades in respect of any resultant reduction in nitrogen, phosphorus, sediment or microbial pathogens when treatment plant processes are already achieving a high level of contaminant reduction through the application of the Best Practicable Option*.</del> "
Policy 13: Point sources consent duration	PC1-10354	Support the provision with amendments	AMEND Policy 13 to read: "When determining the... a. <del>A consent term exceeding 25 years, where</del> <u>The applicant demonstrates the approaches...</u> "
Policy 14: Lakes Freshwater Management Units	PC1-10362	Support the provision with amendments	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-10364	Support the provision	RETAIN Policy 16.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-10365	Support the provision	RETAIN Policy 17.
3.11.4 Implementation methods	PC1-10466	Support the provision with amendments	ADD a NEW Method to read: " <u>3.11.4.13 Decision support system</u> <u>The Waikato Regional Council working with regional stakeholders will:</u>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			a. <u>Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u> For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a <b>sub-catchment, property and enterprise</b> level - to reducing the diffuse discharge of contaminants within the sub-catchment where <b>property</b> and/or <b>enterprise</b> is located."
3.11.4.1 Working with others	PC1-10366	Support the provision with amendments	AMEND Method 3.11.4.1 to read: "Working with <del>others</del> <u>Waikato and Waipā River Iwi partners and Regional Stakeholders.</u> Waikato Regional Council will work with <u>regional</u> stakeholders including..."
3.11.4.2 Certified Industry Scheme	PC1-10389	Support the provision with amendments	AMEND Method 3.11.4.2 to read: "Certified Industry Scheme... b. Oversight, and monitoring of Farm Environment Plans: c. Information <u>provision</u> sharing; d. <u>Aggregate/Collective</u> reporting on Certified... e. Process for dealing with non-compliance by the Certified Industry Scheme; f. <u>Process for dealing with non-compliance by individual members of the Certified Industry Scheme; and</u> e-g. Consistency across the various Certified Industry Schemes."
3.11.4.3 Farm Environment Plans	PC1-10392	Support the provision with amendments	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation</u> actions to reduce those risks <del>in order</del> to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with <del>more</del> <u>standardised</u> monitoring <u>programme</u> and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on</u> risk assessment <u>and the outcome of previous monitoring results.</u> <u>Waikato Regional Council will prepare an audit schedule for undertaking</u> robust third party audit (independent of the farmer and Certified Farm Environment Planner) <del>and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans."</del>
3.11.4.4 Lakes and Whangamarino Wetland	PC1-10398	Support the provision with amendments	AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working with <del>others</del> <u>stakeholders</u> , will: a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment.</u> <del>a-b.</del> Build on the Shallow Lakes Management Plan by... <del>b-c.</del> Prepare and implement Lake Catchment Plans with community involvement which include : i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community).</u> "
3.11.4.5 Sub-catchment scale planning	PC1-10413	Support the provision with amendments	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where <del>it has been shown to be required</del> <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently.</u> Sub-catchment planning..."
3.11.4.6 Funding and implementation	PC1-10416	Support the provision	RETAIN Method 3.11.4.6.
3.11.4.7 Information needs to support any future allocation	PC1-10426	Support the provision with amendments	AMEND Method 3.11.4.7 to read: "Gather information and commission... any <del>future</del> framework for the allocation of diffuse discharges <u>by 2026</u> including:

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits <del>in the future</del> ... <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>
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-10436	Support the provision with amendments	AMEND Method 3.11.4.8 to read: "...b. Use <del>this to inform future</del> <u>the best available information to develop</u> changes to the Waikato Regional Plan <u>by 2026</u> to manage discharges..."
3.11.4.9 Managing the effects of urban development	PC1-10442	Support the provision with amendments	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built environment <del>which anticipates and addresses</del> <u>to address the cumulative effect of urban development on water quality</u> over the long-term."
3.11.4.10 Accounting system and monitoring	PC1-10443	Support the provision with amendments	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring network ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including <del>biological</del> monitoring tools... Community Index <u>and Cultural Health Index</u> to provide the basis for... d. <del>An information</del> <u>A freshwater accounting system that accounts</u> for the diffuse discharges <del>that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges</del> <u>at the enterprise or property scale...</u> "
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-10460	Support the provision with amendments	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. <del>Review and report</del> <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</u> <del>targets in 2020 and 2024.</del> " AND DELETE 3.11.4.11 b.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-10464	Support the provision	RETAIN Method 3.11.4.12.
3.11.5 Rules	PC1-10475	Support the provision with amendments	AMEND the heading of Rule 3.11.5 to read: "3.11.5 <u>Land Use</u> Rules/Nga Ture."
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-10480	Support the provision	RETAIN Rule 3.11.5.1
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-10485	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> "
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-10487	Support the provision with amendments	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan <del>provided</del> <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 shall be considered subject to Rule 3.11.5.6.</u> " OR

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			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.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-10503	Support the provision with amendments	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 <del>undertaking</del> <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... iii. The actions, timeframes and other... unless other suitable <u>and identified</u> mitigations are... vii. The timeframe and circumstance... Farm Environment Plan <del>shall be</del> amended..."
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-10508	Support the provision	RETAIN Rule 3.11.5.6.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-10511	Support the provision	RETAIN Rule 3.11.5.7.
Schedule A - Registration with Waikato Regional Council	PC1-10519	Support the provision with amendments	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. <u>A map of the property showing all land parcels</u> c. Legal description of the <u>individual land parcels that comprise the property or enterprise</u> as per the certificate(s) of title... 6. Properties that graze livestock must also provide <u>an additional</u> map showing:... ii. <u>Confirmation of water</u> <del>Water</del> bodies listed in Schedule C <u>(and provided by Waikato Regional Council in a map)</u> for stock exclusion within..."
Schedule B - Nitrogen Reference Point	PC1-10554	Support the provision with amendments	AMEND Schedule B to read: "A property or enterprise with a... b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> <del>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period</del> (specified in clause f)... f. The reference period is <u>an average of the five years between the five financial years spanning 2011/12 to 2015/16</u> (as consistent with the five year rolling average in 5(a) in Schedule 1) <del>the two financial years covering 2014/2015 and 2015/2016</del> , except for commercial vegetable..." AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions: <ul style="list-style-type: none"><li>• (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>"</li></ul> 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> "

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			<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 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>
Schedule C - Stock exclusion	PC1-10569	Support the provision with amendments	<p>AMEND Schedule C to read: "Water bodies from which cattle...</p> <p>i. Any river that <del>is</del> <u>continually contains surface waterflowing</u> (i.e. that is not identified as an <u>intermittently flowing river</u>).</p> <p>ii. Any drain (<u>including farm drain canal</u>) that continually contains surface water.</p> <p>iii. Any wetland, including a constructed wetland <u>that has a direct connection with continuously flowing surface water.</u>"</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-10592	Support the provision with amendments	<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) <del>and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</del></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>i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses <del>from</del> <u>to</u> these areas through...</p> <p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; <u>and</u></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</u> (if different); and...</p> <p>4. A <u>detailed</u> description of the <u>following</u>:</p> <p><u>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</u></p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>risk assessment in 2 above (having regard to their relative priority) as well as where the mandatory <u>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 programme of works that sets out:</p> <p>a. The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</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> <p>iii. <u>Record of audit by independent third party accredited auditor.</u></p> <p>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.</p> <p>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."</p>
Schedule 2 - Certification of Industry Schemes	PC1-10620	Support the provision with amendments	<p>AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System</p> <p>The application must <u>clearly</u> demonstrate that the...</p> <p>a. <del>the achievement of</del>the water quality targets referred to...</p> <p>c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u></p> <p>d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u></p> <p>2. Has an appropriate ownership structure, governance arrangements and management (<u>including capacity and capability to undertake the coordinated management of Farm Management Plans.</u></p> <p>3. <u>Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</u></p> <p>4. <u>Has the appropriate resources to achieve its function and responsibilities under 1(a), including monitoring, auditing and reporting.</u></p> <p><del>35.</del> Has documented systems, processes, and...</p> <p>a. Competent and consistent performance in <u>preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></p> <p>b. <u>Effective internal monitoring of performance, including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. <u>Robust data management (both spatial and temporal)..</u></p> <p>d. ...</p> <p>e. <u>Timely and appropriate detailed reporting, including (but not limited to):</u></p> <p>i. <u>progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></p> <p>ii. <u>current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>f. Corrective actions will be implemented <u>where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u>  <u>g. Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u>  h. Internal quality control <u>and verification.</u>  i. The responsibilities <u>and accountability</u> of all parties to the Certified Industry Scheme are clearly stated <u>and enforced...</u>  j. An accurate and up to date register of scheme membership is <u>established and maintained ...</u>  k. ...  l. The articles of the scheme, <u>including its register of membership</u> are available for public viewing.</p> <p>B. People  The application must demonstrate...  1. <del>These</del><u>The nominated parties responsible for generating and auditing Farm Environment Plans are Certified Farm Environment Planners suitably qualified and experienced.</u>  2. Auditing of Farm Environment Plans - <u>prepared under the Certified Industry Scheme - requirements will be undertaken by the parties that are accredited auditors</u> and independent of the Farm...  c. Farm Environment Plans  The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1."  Or  AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.</p>
<p>Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments</p>	<p>PC1-10257</p>	<p>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.  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 main stem and sub-catchments.  AND RETAIN the 80-year numerical targets for Chlorophyll <i>a</i> 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>
<p>Additions to Glossary of Terms</p>	<p>PC1-10630</p>	<p>Support the provision with amendments</p>	<p>ADD a NEW definition to read: "<u>Intermittently flowing river: Intermittently flowing river means a river or stream that, in its natural state during an average year, stops flowing on at least one occasion during the year.</u>"</p>
<p>Definition - Enterprise</p>	<p>PC1-10629</p>	<p>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>



## Twining, Murray Ian and Robyn Joy

Submitter ID: 72587

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6779	Support the provision with amendments	<p>AMEND to REINSTATE Objective 6 (Withdrawn) as originally proposed</p> <p>AND AMEND to REINSTATE Policy 15 (Withdrawn) restoring Whangamarino Wetland</p> <p>AND AMEND Policy 15 (Withdrawn) to be holistic and include all sources influencing the health and well-being of the Waikato River and its catchments especially pest fish species, in relation to sub-catchment management.</p> <p>AND MAKE any consequential amendments including to the objectives, policies and rules or restructuring to give effect to the relief sought.</p> <p>AND WITHDRAW PPC1 until the provision for the north eastern portion [Hauraki Iwi area] are amended and the Vision and Strategy review is completed, and a new Section 32 analysis has been undertaken which investigates the revised the impact on society and economy.</p>
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-6772	Support the provision with amendments	<p>RETAIN the long-term restoration and protection of water quality for the Waikato and Waipā Rivers in Objective 1</p> <p>AND AMEND PPC1 to be holistic and include all factors influencing the health and well-being of the Waikato River and its catchments, including koi carp, point source discharges and hydro dams</p> <p>AND AMEND to address contaminants on a sub-catchment basis, to enable targeting of the highest discharging sub-catchments</p> <p>AND DELETE from Table 3.11.1 the flood/high flow conditions from water quality target data.</p>
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-6773	Support the provision with amendments	<p>RETAIN Objective 2 the maintenance of long-term social, economic and cultural well-being in the Waikato and Waipā catchment communities.</p> <p>WITHDRAW PPC1 until the provision for the north eastern portion [Hauraki Iwi area] are amended and the Vision and Strategy review completed,</p> <p>AND ENSURE a new Section 32 analysis has been undertaken which investigates the revised the impact on society and economy.</p> <p>AND AMEND the Rules to remove the Nitrogen Reference Point</p> <p>AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored Farm Environment Plan</p> <p>AND AMEND to address contaminants on a sub-catchment basis, to enable targeting of the highest discharging sub-catchments</p> <p>AND AMEND to develop robust indicators to measure social, economic and cultural well-being.</p>
Objective 3: 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	PC1-6774	Support the provision with amendments	<p>RETAIN Objective 3's aim to achieve 10% of the long-term water quality targets set out in PPC1 by 2026.</p> <p>AND AMEND the Rules to remove Nitrogen Reference Points.</p> <p>AND AMEND to adopt a sub-catchment approach to ensure collaborative and fair management of resources within each sub-catchment.</p> <p>AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.</p>
Objective 4: People and community resilience	PC1-6775	Support the provision with amendments	<p>RETAIN Objective 4 the staged approach to change.</p> <p>AND AMEND the rules in PPC1 to remove Nitrogen Reference Point and land use change restriction.</p>

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			AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-6777	Support the provision with amendments	AMEND Objective 5/PPC1 to acknowledge primary production as a core value to reflect Mana Tangata.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12662	Support the provision with amendments	AMEND Policy 1 to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12663	Support the provision with amendments	RETAIN Policy 1's managing diffuse discharges and water quality on a sub-catchment basis.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12661	Oppose the provision with amendments	AMEND Policy 1 (c) to read: "c. Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes for areas with a slope less than 15 degrees and on those slopes <u>exceeding 15 degrees where break feeding occurs.</u> AND AMEND Policy 1 by adding the following bullet point (d): " <u>...d. 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> " AND AMEND to provide clarification on how slope is measured, given the ranges of topography experiences within each paddock and adjoining watercourses.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-6780	Support the provision with amendments	AMEND the rules in PPC1 to reflect Policies 1 and 9.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12946	Support the provision with amendments	AMEND PPC1 to reflect Policy 1 in adopting a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12947	Oppose the provision	AMEND PPC1 to remove Nitrogen Reference Points.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-6782	Support the provision with amendments	RETAIN Policy 2's support for appropriate mitigation strategies to be adopted in the context of water quality gains, through a tailored Farm Environment Plan.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-6784	Support the provision with amendments	RETAIN the Policy 4 provisions allowing for low intensity land uses to continue and establish. AND DELETE from Policy 4 any signalling of future mitigation action requirements.
Policy 5: Staged approach	PC1-6785	Support the provision with amendments	RETAIN the Policy 5 staged approach. AND AMEND the rules in PPC1 to remove the Nitrogen Reference Point.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains, through a tailored Farm Environment Plan..
Policy 6: Restricting land use change	PC1-6786	Oppose the provision	AMEND Policy 6 to support land use change being a restricted discretionary activity for high priority water quality sub-catchments and a permitted activity for low priority water quality sub-catchments. AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.
Policy 7: Preparing for allocation in the future	PC1-6788	Support the provision with amendments	RETAIN the Policy 7 approach of reducing diffuse discharges while considering land suitability. AND AMEND PPC1 to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan. AND AMEND so Waikato Regional Council to work collaboratively with stakeholder groups to develop sub-catchment management approach.
Policy 8: Prioritised implementation	PC1-6789	Support the provision	RETAIN Policy 8.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-6790	Support the provision with amendments	RETAIN Policy 9 managing water quality on a sub-catchment level. AND AMEND the rules to reflect Policy 1 and 9. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan
Policy 10: Provide for point source discharges of regional significance	PC1-6792	Support the provision with amendments	RETAIN Policy 10 consideration of regional significance of point source discharges infrastructure and industry. AND AMEND PPC1 to be holistic and include all sources influencing the health and well-being of the Waikato River and its catchments, including Koi Carp, point sources, and hydro-dams. AND AMEND to a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-6793	Support the provision with amendments	RETAIN Policy 11 Best Practicable Options AND AMEND to include all stakeholders in applying Best Practical Options through Farm Environment Plans. AND AMEND to clarify the meaning of 'significant toxic adverse effect'. AND AMEND the Rules to reflect Policy 11.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-6794	Support the provision with amendments	RETAIN Policy 12's approach to considering past technology upgrades and costs associated with upgrading. AND AMEND to a sub-catchment management approach to ensure collaborative and fair management of resources within the region. AMEND PPC1 to allow considerations of past technology upgrades and costs to across all sources influencing the health and well-being of the Waikato and Waipā rivers.
Policy 13: Point sources consent duration	PC1-6795	Support the provision with amendments	RETAIN Policy 13's consideration of the consent duration in relation to the magnitude and significance of the investment made.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND PPC1 to include consideration when applying for a consent of the magnitude and significance of the investment for all property owners and enterprises within the Waikato and Waipā Catchments.
Policy 14: Lakes Freshwater Management Units	PC1-6796	Support the provision	RETAIN Policy 14 as proposed.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-6797	Support the provision with amendments	RETAIN Policy 16 flexibility for development of Māori land AND AMEND PPC1 to include a Rule to reflect Policy 16 AND AMEND to consider a similar flexibility for the development of land for all property owners and enterprises.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-6798	Support the provision with amendments	RETAIN Policy 17's support for applying policies and methods based on the Vision and Strategy. AND WITHDRAW PPC1 until the withdrawn north-eastern portion of the catchment and the Vision and Strategy has been amended.
3.11.4.1 Working with others	PC1-6799	Support the provision	RETAIN Method 3.11.4.1 as proposed.
3.11.4.2 Certified Industry Scheme	PC1-6801	Support the provision	RETAIN Method 3.11.4.2 as proposed.
3.11.4.3 Farm Environment Plans	PC1-6802	Support the provision with amendments	RETAIN Method 3.11.4.3's tailored, risk based Farm Environment Plan. AND AMEND to enable land users, who have adequate experience and capabilities, to work with an approved industry or scheme, run by Waikato Regional Council, to develop their own Farm Environment Plan based upon a common template.
3.11.4.4 Lakes and Whangamarino Wetland	PC1-6803	Support the provision with amendments	RETAIN or REINSTATE Method 3.11.4.4's working with others in relation to lakes and Whangamarino Wetland. AND RETAIN support for managing pest weeds and fish. AND REINSTATE Method 3.11.4.4 d to include Whangamarino Wetland AND AMEND PPC1 to include the management of pest weeds and fish in the policies, objectives and rules in the Waikato and Waipā Catchments.
3.11.4.5 Sub-catchment scale planning	PC1-6804	Support the provision with amendments	RETAIN Method 3.11.4.5's managing diffuse discharges and water quality on a sub-catchment level. AND AMEND PPC1 to reflect Method 3.11.4.5 in the rules.
3.11.4.6 Funding and implementation	PC1-6805	Support the provision	RETAIN Method 3.11.4.6 as proposed.
3.11.4.7 Information needs to support any future allocation	PC1-6806	Support the provision with amendments	RETAIN Method 3.11.4.7 support for gaining data. AMEND PPC1 to enable the management of diffuse discharges on a sub-catchment basis.
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-6807	Support the provision with amendments	RETAIN Method 3.11.4.8's support for gaining data. AMEND PPC1 to enable the management of diffuse discharges on a sub-catchment basis.
3.11.4.9 Managing the effects of urban development	PC1-6809	Support the provision	RETAIN Method 3.11.4.9 as proposed.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-6811	Support the provision	RETAIN Method 3.11.4.12 as proposed.

## Tye, Walter Rufus

Submitter ID: 73342

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4352	Oppose the provision	No specific decision sought for PPC1.

## Tye Farms Ltd

Submitter ID: 73341

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4354	Oppose the provision	No specific decision sought for PPC1.

## Tylee, Brian William

Submitter ID: 73530

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7437	Oppose the provision	<p>AMEND PPC1 to specify Olsen phosphorus limits as follows: 40 for dairying, 25 for sheep and beef farms and 60 for horticulture, applying a sinking lid policy where levels exceed these limits.                      AND delete any limits on stocking rates, addressing the issue with education about best practice.                      AND Address Nitrogen as follows:</p> <ul style="list-style-type: none"> <li>• Set a nitrogen fertiliser limit of 125kg/ha/year</li> <li>• Set a maximum of 25 units/ha in one dressing</li> <li>• Ensure stock receive sufficient Sodium</li> <li>• Ensure stock have unrestricted access to good water</li> <li>• Ensure stock diets are managed so that stock can digest pasture well and convert nitrates to microbial protein</li> <li>• Limit nitrogen fertiliser for cropping to 150 kg/ha/year</li> </ul> <p>AND AMEND PPC1 to exempt properties with low Nitrogen from providing Nutrient Management Plan.                      AND AMEND to address other factors affecting water quality, including eliminating Koi Carp.</p>
Collaborative approach	PC1-7446	Oppose the provision	No specific decision requested for Collaborative Approach.
Schedule B - Nitrogen Reference Point	PC1-7423	Oppose the provision	No specific decision requested for Schedule B.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule C - Stock exclusion	PC1-7444	Oppose the provision	No specific decision requested for Schedule C.

## Upper Maire Creek Sub Catchment

Submitter ID: 72970

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7239	Support the provision with amendments	AMEND PPC1 to a sub-catchment approach. AND AMEND PPC1 so that high discharge practices are improved first.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-4350	Support the provision with amendments	AMEND Rule 3.11.5.2(2) so that stock exclusion is managed through the Best Practicable Option. AND AMEND Rule 3.11.5.2 to increase the stocking rate to 14 stock units per hectare of total enterprise land.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-4355	Oppose the provision	AMEND Rule 3.11.5.3 to remove Nitrogen Reference Point provisions. AND AMEND so that stock exclusion less than 15 degrees except in high flood zones where other mitigation necessary. AND AMEND to extend the timeframes for Priority 1 catchments. AND AMEND to enable farmers with the right qualifications to write their own Farm Environment Plans. AND AMEND fencing requirements to reflect the National Policy Statement for Freshwater Management amendments.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-4356	Oppose the provision	AMEND PPC1 to give consideration to the level of water quality improvement needed in the sub-catchment. AND AMEND to provide a base allowable discharge for the sub-catchment based on the total discharges in the catchment and the level of water quality improvement needed to meet the short term and 80 year targets. AND AMEND to require high dischargers to move towards these targets and provide flexibility to lower dischargers to increase to an acceptable level. AND AMEND fencing requirements to reflect the National Policy Statement for Freshwater Management amendments.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-4361	Oppose the provision	AMEND Rule 3.11.5.7 as requested by Federated Farmers in its submission. [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.] AND AMEND to give consideration to the level of water quality improvement needed in the sub-catchment.
Schedule A - Registration with Waikato Regional Council	PC1-4369	Support the provision with amendments	AMEND Schedule A - the date to be 30 June. AND AMEND so that water bodies are defined as being 1 metre wide and 30 centimetres deep. AND DELETE stocking rate OR AMEND so that stocking rate is used over the whole farm area.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-4373	Oppose the provision	AMEND Schedule B so that Nitrogen Reference Points are only required in sub-catchments that have an issue with nitrogen.
Schedule C - Stock exclusion	PC1-4376	Oppose the provision	AMEND Schedule C to enable the use of Best Practicable Options as an alternative to the proposed stock exclusion standards AND AMEND to follow national standards AND AMEND the definition of water body to 1 metre wide and 30cm deep AND AMEND the fencing threshold for streams from 15 degrees to 25 degrees AND subsidise 50 percent of the cost of fencing.
Schedule 1 - Requirements for Farm Environment Plans	PC1-4380	Oppose the provision	AMEND Schedule 1 to enable farmers with the necessary qualifications to develop their own Farm Environment Plans. AND AMEND so that Farm Environment Plans are only required for sub-catchments that are included in Table 3.11-1. AND AMEND so that Farm Environment Plans are only required with a stocking rate of over 18su/ha and if nitrogen is an issue.

## van der Laan, Menso W R

Submitter ID: 71906

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7843	Not stated	No specific decision sought for PPC1.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-7847	Oppose the provision	AMEND Rule 3.11.5.3 as requested by Federated Farmers in their submission. [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is: 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 REMOVE Rule 3.11.5.2 (4) (c). AND ADD a NEW permitted activity rule to read: <u>"The use of land for farming activities (excluding commercial vegetable production) where the property area is greater than 4.1 hectares is a Permitted Activity provided that:</u> <u>1) The change in the use of land is not from non-milking dairy farming to milking dairy farming; or</u> <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> <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> AND AMEND PPC1 so that normal farming activities in rural areas are permitted activities.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities.]
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-7921	Oppose the provision	<p>AMEND Rule 3.11.5.4 as requested by Federated Farmers in their submission.  [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is:  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 REMOVE Rule 3.11.5.2 (4) (c).  AND ADD a NEW permitted activity rule to read:  <u>"The use of land for farming activities (excluding commercial vegetable production) where the property area is greater than 4.1 hectares is a Permitted Activity provided that:</u>  <u>1) The change in the use of land is not from non-milking dairy farming to milking dairy farming; or</u>  <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>  <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>  AND AMEND PPC1 so that normal farming activities in rural areas are permitted activities.  AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities.]</p>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-7923	Oppose the provision	<p>AMEND Rule 3.11.5.7 as requested by Federated Farmers in their submission.  [AMEND Rule 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>
Schedule B - Nitrogen Reference Point	PC1-7927	Oppose the provision	<p>AMEND Schedule B as requested by Federated Farmers in their submission.  [AMEND Schedule B 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 B.  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 B match the Policies, Methods, definitions, etc, to which Schedule B relates.]</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-7930	Oppose the provision	<p>AMEND Schedule 1 as requested by Federated Farmers in their submission.  [AMEND Schedule A 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 A.  AND ENSURE that the information sought by Council is no more than is necessary to achieve the purposes for which it is sought.]</p>



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND ENSURE that the requirements set out in Schedule A match the Policies, Methods, definitions, etc, to which Schedule A relates.]

## van der Staak, Guus

Submitter ID: 59193

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-3414	Support the provision with amendments	AMEND PPC1 to consider alternative options like bigger setbacks from water ways or stock reduction. AND CLARIFY what other types of other discharges occur.

## van der Voorden, Vera and Nora

Submitter ID: 74109

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7269	Support the provision with amendments	AMEND PPC1 by setting bottom lines and targets using the National Policy Statement for Freshwater Management. AND AMEND PPC1 to set timeframes for adjustments required in land use and discharge of contaminants appropriate to each case AND AMEND where significant adjustment times are required, targets should be set in Regional Plans at no more than 5 year intervals. AND AMEND PPC1 by providing a threshold-setting process identifies thresholds in sub-catchments and catchments coming under resource use pressure AND AMEND to ensure the threshold-setting process recognises spatial variation and the interactions between contaminants and takes into account the following: the size of the resource, proportion of the limit that is being used, current and expected rate of uptake of the remaining portion of the limit, the likely scale and extent of unmet demand, historic inputs, persistence of contaminants in the environment and lag times AND AMEND PPC1 to ensure that the importance of protecting the outstanding character is recognised in policies and rules AND AMEND PPC1 to develop Good Management Practices AND AMEND PPC1 to provide a statement to the effect that downwards movement of attribute data within NOF bands (trends as opposed to seasonal variation) should not be defined as 'maintenance' of water quality. AND AMEND PPC1 to ensure that all appropriate objectives, policies, methods of implementation and rules that apply to perennial streams should also apply to intermittent streams.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND PPC1 to determine the outcomes required to safeguard life-supporting capacity and the ecosystem health of freshwater to maintain or enhance water quality (where a freshwater limit is met)</p> <p>AND AMEND PPC1 to determine the outcomes required to safeguard life-supporting capacity and the ecosystem health of freshwater to ensure that freshwater limits are not breached, and that targets are met</p> <p>AND AMEND PPC1 to determine the outcomes required to safeguard life-supporting capacity and the ecosystem health of freshwater to protect freshwater bodies that are significant but not 'outstanding'</p> <p>AND AMEND PPC1 to include all wetlands in a Schedule that has appropriate criteria so that wetlands that have not yet been assessed can be considered 'significant'</p> <p>AND AMEND PPC1 by including numeric limits, timeframes and targets for suspended sediment and benthic sediment attributes in the catchment.</p> <p>AND AMEND PPC1 to include supporting statements and a commitment to be negotiating nationally consistent standards for nitrogen in water</p> <p>AND AMEND to provide greater rigour on nitrate levels.</p>
3.11.1 Values and uses for the Waikato and Waipa Rivers	PC1-11284	Support the provision with amendments	<p>AMEND 3.11.1 Values and uses for the Waikato and Waipa Rivers to ensure that Freshwater values being managed for in the Freshwater Management Units do not include the following: safeguarding the life-supporting capacity of water and associated ecosystems, the natural form, character, functioning and natural processes of water bodies and margins, including natural flows, velocities, levels, variability and connections, the natural conditions of fresh water, free from biological or chemical alterations resulting from human activity, so that it is fit for all aspects of its intrinsic values, healthy ecosystem processes functioning naturally, healthy ecosystems supporting the diversity of indigenous species in sustainable populations and recreational values</p>
Vision and Strategy for the Waikato River	PC1-7262	Support the provision with amendments	<p>AMEND PPC1 to give effect to Objective A2 and Policy A4 of the National Policy Statement for Freshwater Management until changes under Schedule 1 to give effect to Policy A1 and Policy A2 have become operative.</p>
Intrinsic values - Ecosystem health	PC1-11285	Support the provision with amendments	<p>AMEND Intrinsic values- Ecosystem health to INCLUDE the value of a holistic integrated management approach to the restoration and protection of in stream biodiversity</p> <p>AND AMEND Intrinsic values- Ecosystem health to INCLUDE the value of clean fresh water to restore and protect the aquatic native vegetation so as to provide habitat and food for native aquatic species.</p>
Use values - Primary production	PC1-11286	Support the provision with amendments	<p>AMEND Use values- Primary production to INCLUDE freshwater objectives, attributes, limits and targets in such a way as to avoid, mitigate, or remedy actions during harvesting operations that accelerate erosion and minimise the discharge of sediment to water bodies</p> <p>AND AMEND to INCLUDE freshwater objectives, attributes, limits and targets in such a way as to limit riparian disturbance by felling away from the riparian zone except where unsafe or impractical to do so</p> <p>AND AMEND to INCLUDE freshwater objectives, attributes, limits and targets in such a way as to avoid more than minor adverse effects</p> <p>AND AMEND to INCLUDE freshwater objectives, attributes, limits and targets in such a way that ensure that mechanical land preparation is parallel to the contour where practical</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND to ensure PPC1 has clear, enforceable permitted activity standards that will effectively control potential environmental effects</p> <p>AND AMEND to ENSURE that where sufficiently clear, enforceable permitted activity conditions cannot be devised, move to a consenting regime</p> <p>AND AMEND to ENSURE that where permitted activity standards are unlikely to be sufficient in over-allocated catchments, a consenting regime is required to ensure that the cumulative effects of forestry on water quality are managed to achieve targets within a defined timeframe</p> <p>AND AMEND to PROVIDE setbacks to harvesting, pruning-to-waste, all earthworks and any mechanical operations</p> <p>AND AMEND to apply setbacks to intermittent, as well as perennial streams</p> <p>AND AMEND to PROTECT the likely presence of threatened freshwater fish species and to provide appropriate protection to water quality, and riparian health</p> <p>AND AMEND to ENSURE a minimum setback of 10 metres on small streams; 20 metres on rivers between 3 and 20 metres; and rivers over 20 metres wide, and any protected by Water Conservation Orders should have a minimum setback of 30 metres</p> <p>AND AMEND to ENSURE no intrusion into setback areas from all forestry operations</p> <p>AND AMEND to ENSURE that the setback from wetlands is 30 metres</p> <p>AND AMEND to ENSURE that 30 metre setbacks for permitted earthworks within significant ecological areas or the appropriate setback should be determined having regard to the slope, drainage class and soil content.</p>
3.11.2 Objectives	PC1-7449	Support the provision with amendments	<p>AMEND 3.11.2 Objectives by including the following parameters as freshwater objectives, natural character including the condition of the riparian margin, dissolved oxygen, deposited and suspended sediment, Te Hauora o te Taiao/ the health and mauri of the environment, freshwater macroinvertebrate health, periphyton, cyanobacteria, benthic cyanobacteria, dissolved inorganic nitrogen and Total Nitrogen in the tributaries/sub-catchments, Total Phosphorus in the tributaries/sub-catchments, temperature and pH, toxic heavy metals, barriers to fish migrations, water flows and levels, and estuaries</p> <p>AND AMEND to include nutrient loads (nitrogen and phosphorus), sediment loads, E-coli, toxic contaminants loads (e.g metals, organic compounds), micro-organisms and temperature.</p> <p>AND AMEND to ensure that limits are set at levels that will allow freshwater objectives to be set</p> <p>AND AMEND to ensure that in over-allocated catchments (where the existing load exceeds the desired limit) the Waikato Regional Council should set both interim limits and targets (a limit to be met by a defined time in the future). Targets must be demonstrably set at levels that will allow freshwater objectives to be set</p> <p>AND AMEND to ensure timeframes are well defined and achievable</p> <p>AND AMEND to ensure that once limits are set, pollutant loads to land should be identified on both a sub-catchment and farm level taking into account the assimilative capacity of the land and attenuation of the soil type. The Land Use Capability classification system should be part of this calculation until further research associated with a land suitability approach is complete or practicable to use.</p>
Objective 1: Long-term restoration and protection of water quality for	PC1-11278	Support the provision with amendments	AMEND PPC1 to give effect to Objective A2 and Policy A4 of the National Policy Statement for Freshwater Management.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
each sub-catchment and Freshwater Management Unit			
3.11.3 Policies	PC1-11280	Support the provision with amendments	AND AMEND 3.11.3 Policies by including a policy that specifies " <u>Waikato Regional Council does not support an 'under and overs' approach to water quality between sub-catchments within a catchment or catchments within a FMU and/or region.</u> "
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-11283	Support the provision with amendments	AMEND Policy 2 to give effect to Objective A2 of the National Policy Statement for Freshwater Management AND AMEND to give effect to Policy A4 of the National Policy Statement for Freshwater Management.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12948	Support the provision with amendments	AMEND PPC1 to INCLUDE Dissolved Inorganic Nitrogen and dissolved reactive phosphorus with associated limits and targets within each sub-catchment at levels which provide for ecosystem health AND AMEND to ensure Dissolved Inorganic Nitrogen is set at levels which provide for ecosystem health, not toxicity AND AMEND to ensure once a limit is set, the corresponding load or quantity of Dissolved Inorganic Nitrogen can be allocated.
Policy 5: Staged approach	PC1-7264	Support the provision with amendments	AMEND PPC1 to give effect to Objective A2 and Policy A4 of the National Policy Statement for Freshwater Management.
3.11.4 Implementation methods	PC1-11279	Support the provision with amendments	AMEND PPC1 to ensure that methods are set out once a target is set AND AMEND PPC1 to ensure Waikato Regional Council develops a freshwater implementation and programme of change plan which includes the aforementioned elements.
3.11.4.2 Certified Industry Scheme	PC1-11287	Oppose the provision	No specific decision sought.
3.11.5 Rules	PC1-7277	Oppose the provision with amendments	AMEND 3.11.5 Rules to ensure that minimum output standards/limits associated with phosphorus, nitrogen, sediment and faecal contaminants are met AND ADD a NEW rule to PPC1 that identifies lower stocking rates where applicable.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-11281	Support the provision with amendments	AMEND Rule 3.11.5.1 to ensure that it complies with Section 70 RMA AND AMEND PPC1 to INCLUDE information on how Rule 3.11.5.1 is going to be monitored and reviewed.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-11282	Support the provision with amendments	AMEND Rule 3.11.5.2 to ensure that it complies with Section 70 RMA AND AMEND PPC1 to INCLUDE information on how Rule 3.11.5.2 is going to be monitored and reviewed.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-7390	Support the provision with amendments	AMEND Rule 3.11.5.1 to ensure that it complies with Section 70 RMA. AND AMEND Rule 3.11.5.3 to require all Farm Environment Plans to be a controlled activity AND AMEND to require audits to assess farm practices against the Farm Environment Plans AND AMEND the Farm Environment Plan rules to include clear thresholds AND AMEND to include rules relating to the over fertilising, over stocking, over grazing, over water and over draining.
Schedule B - Nitrogen Reference Point	PC1-7398	Oppose the provision with amendments	AMEND Schedule B to ensure that allocation is based on the Land Use Capability and suitability AND AMEND to ensure that the values of water bodies are identified AND AMEND to ensure that once values have been identified, limits are set to protect the most stringent value on a spatial and temporal basis

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to ensure allocation of costs to clean up should be polluter pays AND AMEND to ensure that any rate on clean up tax is based on percentage contribution by sector AND AMEND to provide a pollution tax to clean up the waterbodies. AND AMEND to ensure that revenue obtained through abstraction and metering is used for conservation purposes as well as cost recovery for monitoring costs.
Schedule 2 - Certification of Industry Schemes	PC1-7454	Oppose the provision	No specific decision sought Schedule 2.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-7451	Support the provision with amendments	AMEND Table 3.11-1 to ensure that water quality is as a minimum maintained as required by RMA Section 30 (1) (c) (ii) and (iiia) AND AMEND PPC1 so that the threshold for water clarity, to measure swimmability is a minimum of 1.6m.

## van Loon, Jos

Submitter ID: 73115

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-10192	Oppose the provision with amendments	AMEND Rule 3.11.5.4.iii to allow farmers with Nitrogen Reference Points in the lowest quartile to fluctuate by 5kgs/N/ha upwards. AMEND Rule 3.11.5.4. iv to require farmers with a Nitrogen Reference Point in the upper quartile to reduce nitrogen discharge by 1 July 2020.
Schedule B - Nitrogen Reference Point	PC1-10191	Oppose the provision with amendments	AMEND Schedule B to enable developing farms to use the highest of a 5 year period for the Nitrogen Reference Point AND AMEND to extend the 2 year Nitrogen Reference Point period to 3 or 4 years for a status quo farm AND AMEND to provide for some flexibility for farmers who have been leading environmental improvement

## Verkerk, Gwyneth

Submitter ID: 60476

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-1269	Support the provision with amendments	ENSURE work to implement PPC1 starts without delay, and every effort is made to expedite the further round of hearings and discussion. AND AMEND PPC1 so that there is greater development of policies and rules to deal with non-compliance.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-1270	Support the provision	AMEND Objective 1 so that the importance of wetlands in ensuring sustainable farming practices into the future beyond the period of PPC1 must be given greater emphasis in the early stages of plan development. AND the work including expanding the regions wetlands is managed at a sub-catchment planning level.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-1282	Oppose the provision with amendments	AMEND Policy 1 so that low nitrogen dischargers are permitted to increase their discharges by a margin, up to a limit, with that increase in discharges offset by those in the third quartile required to reduce their discharges to the median for their sub-catchment.
Policy 6: Restricting land use change	PC1-1281	Support the provision with amendments	AMEND Policy 6 to allow greater flexibility for horticulture producers to utilise small parcels of land across the region within their farm rotation systems, provided their purpose is for fruit and vegetable production for the New Zealand market.
Policy 7: Preparing for allocation in the future	PC1-1274	Support the provision	Invest in soil science to better understand the processes of nitrogen attenuation in the region's soils. Policy 7 AND future rules are put in place to ensure that the nature of the farming activity is appropriate to the land.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-1271	Support the provision	AMEND Policy 9 so that the importance of wetlands in ensuring sustainable farming practices into the future beyond the period of PPC1 is given greater emphasis in the early stages of plan development. AND the work including expanding the regions wetlands is managed at a sub-catchment planning level. ADD a NEW method that imposes a targeted rate per household across the urban community, wherein that money is accumulated to a fund that is available as long-term loans for approved sub-catchment level wetland development projects on a zero or very low interest basis. The fund could also be supported by those point-source dischargers that will in future struggle to meet their targets and may be required to pay mitigation.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-1273	Support the provision with amendments	AMEND Policy 17 so that the importance of wetlands in ensuring sustainable farming practices into the future beyond the period of PPC1 must be given greater emphasis in the early stages of plan development. AND the work including expanding the regions wetlands is managed at a sub-catchment planning level.
3.11.4.5 Sub-catchment scale planning	PC1-1279	Support the provision with amendments	AMEND Method 3.11.4.5 to add a targeted rate per household across the urban community, wherein that money is accumulated to a fund that is available as long-term loans for approved sub-catchment level wetland development projects on a zero or very low interest basis. The fund could also be supported by those point-source dischargers that will in future struggle to meet their targets and may be required to pay mitigation.
3.11.4.7 Information needs to support any future allocation	PC1-1277	Support the provision	AMEND so that there is invest in soil science to better understand the processes of nitrogen attenuation in the region's soils. Method 3.11.4.7. AND future rules are put in place to ensure that the nature of the farming activity is appropriate to the land.
3.11.4.9 Managing the effects of urban development	PC1-1290	Oppose the provision with amendments	AMEND 3.11.4.9 so that PPC1 puts more specific requirement for Hamilton City Council to manage water contamination, including: assessment of historical point sources and development of plans

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			for their remediation; work to reduce run-off from roads and storm water systems; regulations to increase the use of greywater recycling systems; education about the benefits of washing cars on the lawn; consideration to encourage household use of low phosphate detergents.
3.11.5 Rules	PC1-1363	Oppose the provision with amendments	AMEND Rules 3.11.5 so that low nitrogen dischargers are permitted to increase their discharges by a margin, up to a limit, with that increase in discharges offset by those in the third quartile required to reduce their discharges to the median for their sub-catchment.
Schedule 1 - Requirements for Farm Environment Plans	PC1-1283	Oppose the provision with amendments	AMEND Schedule 1 to include an incentive programme to support riparian planting where farmers have completed stock exclusion.

## Verry, Adrian

Submitter ID: 73810

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-2484	Support the provision with amendments	AMEND PPC1 to recognise different land classes and different farming intensification levels.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-2469	Oppose the provision	DELETE from Objective 1 the Nitrogen grandparenting rule.
Objective 4: People and community resilience	PC1-2471	Oppose the provision	DELETE from Objective 4 the Nitrogen grandparenting rule.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-2473	Oppose the provision with amendments	DELETE from Policy 2 the Nitrogen grandparenting rule.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12949	Support the provision with amendments	AMEND Policy 2 to recognise alternative measures to replace fencing AND AMEND to use the national stock exclusion standards.
Policy 7: Preparing for allocation in the future	PC1-2474	Oppose the provision	DELETE from Policy 7 the Nitrogen grandparenting rule.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-2475	Oppose the provision with amendments	DELETE from Rule 3.11.5.2 the Nitrogen grandparenting rule. AND AMEND to recognise alternative measures to replace fencing. AND AMEND to use the national stock exclusion standards.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-2476	Oppose the provision with amendments	DELETE from Rule 3.11.5.3 the Nitrogen grandparenting rule. AND AMEND to recognise alternative measures to replace fencing. AND AMEND to use the national stock exclusion standards.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-2477	Oppose the provision with amendments	DELETE from Rule 3.11.5.4 the Nitrogen grandparenting rule. AND AMEND to recognise alternative measures to replace fencing. AND AMEND to use the national stock exclusion standards.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-2478	Oppose the provision with amendments	DELETE from Rule 3.11.5.5 the Nitrogen grandparenting rule. AND AMEND to recognise alternative measures to replace fencing. AND AMEND to use the national stock exclusion standards.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-2479	Oppose the provision with amendments	DELETE from Rule 3.11.5.6 the Nitrogen grandparenting rule.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13124	Oppose the provision with amendments	AMEND Rule 3.11.5.6 to recognise alternative measures to replace fencing. AND AMEND to use the national stock exclusion standards.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-2480	Oppose the provision	DELETE from Rule 3.11.5.7 the Nitrogen grandparenting rule.
Schedule B - Nitrogen Reference Point	PC1-2481	Oppose the provision	DELETE from Schedule B the Nitrogen grandparenting rule.
Schedule C - Stock exclusion	PC1-2483	Support the provision with amendments	AMEND Schedule C to recognise alternative measures to replace fencing. AND AMEND to use the national stock exclusion standards.

## Verry, Brigid

Submitter ID: 73095

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-7705	Support the provision with amendments	AMEND Rule 3.11.5.1 to include provision for the information gathered from lifestyle blocks to be used to inform and educate property owners of potential environmental impacts and appropriate mitigations
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-7708	Support the provision with amendments	AMEND Rule 3.11.5.2(b)(i) so that stocking rate may increase to a 5-year rolling average OR DELETE so that properties between 4.1 hectares and 20 hectares are treated the same as those between 2 hectares and 4.1 hectares. AND AMEND Rule 3.11.5.2(5) to ensure that the information collected is broadened to all relevant information including effluent disposal and the use of stand of paddocks. AND ensure more research is undertaken on better management of the effluent storage on the property, and with options to recycle manure for other uses.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm	PC1-7718	Support the provision with amendments	AMEND Rule 3.11.5.4 to enable properties less than 20 hectares to have the opportunity to comply with the rule and be a controlled activity.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Environment Plan not under a Certified Industry Scheme			
Schedule A - Registration with Waikato Regional Council	PC1-7720	Support the provision	RETAIN Schedule A.
Schedule C - Stock exclusion	PC1-7721	Support the provision with amendments	AMEND PPC1 so that small property owners under 20 hectares have the opportunity to undertake a Farm Environment Plan under a controlled activity rule, to meet their Schedule C obligations.

## Verry, Mark

Submitter ID: 74180

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4864	Oppose the provision with amendments	AMEND PPC1 to put in place worthwhile plans to alleviate the pollution from our cities into waterways. AND AMEND to focus on remediation at sub-catchment level. AND AMEND so that fencing is on a case by case basis where a clear need is identified.

## Verry, Reon and Wendy

Submitter ID: 72887

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4434	Not stated	No specific decision requested for PPC1 (see other submission points).
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-3780	Support the provision with amendments	AMEND Objective 1 to read: "Long-term restoration and/or protection of water quality for each sub-catchment and Freshwater Management Unit."
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-3783	Support the provision	RETAIN Objective 2.
Objective 3: 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	PC1-3784	Support the provision	RETAIN Objective 3.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 4: People and community resilience	PC1-3785	Support the provision with amendments	DELETE Objective 4b.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-3787	Support the provision with amendments	RETAIN Objective 5(a) and 5(c) AND DELETE Objective 5(b).
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-3791	Support the provision with amendments	AMEND Policy 1 to read: " <del>Manage and require reductions in sub-catchment wide discharges of N, P, sediment and pathogens by</del> Monitor discharges on a sub-catchment basis. In sub-catchments where contaminants are above the 80 year level, manage and reduce as required." AND AMEND to ensure the use of specific and measurable language in Policy 1(a) and 1(b).
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-3793	Support the provision with amendments	AMEND Policy 2 to ensure anyone with a Farm Environment Plan should be a permitted activity.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12950	Support the provision with amendments	AMEND Policy 2(c) to establish Nitrogen Reference Points only in sub-catchments with Nitrogen levels above the 80 year targets.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12951	Support the provision with amendments	AMEND Policy 2(d) to ensure higher emitters reduce their contaminant output before low emitters are required to for any of the 4 contaminants.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12952	Support the provision with amendments	REPLACE Policy 2(e) with: " <u>Stock exclusion to be completed as per Farm Environment Plan recommendations.</u> "
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-3795	Oppose the provision	REPLACE Policy 4 with a policy that has a clearer outlook as to what may be required in the future so investments can have certainty.
Policy 5: Staged approach	PC1-3796	Oppose the provision	AMEND to require Policy 5 to acknowledge investments made on the farm must not be made redundant before the end of their useful life.
Policy 6: Restricting land use change	PC1-3797	Oppose the provision	AMEND Policy 6 to ensure decisions are based on land use suitability and sub-catchment contaminant levels, ownership should not be relevant. AND DELETE reference to Policy 16.
Policy 7: Preparing for allocation in the future	PC1-3801	Support the provision with amendments	DELETE Policy 7b.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-3803	Support the provision	No specific relief sought for Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-3805	Support the provision with amendments	AMEND Policy 10 to read: "Provide for <u>diffuse and</u> point source discharges of regional significance. ... When deciding resource consent applications for <u>diffuse and</u> point source..."

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-3832	Oppose the provision with amendments	AMEND Policy 11(c) to ensure offset measures must occur within the same sub-catchment. If not possible then alter sub-catchment targets.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-3833	Support the provision with amendments	AMEND Policy 12 to ensure diffuse discharge are allowed the same considerations as point source in this policy.
Policy 13: Point sources consent duration	PC1-3834	Support the provision with amendments	AMEND Policy 13 to include all those situations which require consent 3.11.5.4 through 3.11.5.7.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-3837	Oppose the provision	DELETE Policy 16 in its entirety. OR AMEND Policy 16 to read: "Flexibility for development of land returned under Te Tiriti o Waitangi settlements <u>only and multiple owned Māori land</u> "
3.11.4.1 Working with others	PC1-3839	Support the provision with amendments	AMEND Method 3.11.4.1 to include landowners in the named list of stakeholders.
3.11.4.5 Sub-catchment scale planning	PC1-3841	Support the provision with amendments	AMEND to include a date in Method 3.11.4.5(a) which is at least 6 months earlier than when a Farm Environment Plan is required for a property.
3.11.4.6 Funding and implementation	PC1-3842	Support the provision with amendments	AMEND Method 3.11.4.6(b) to read: " <del>Seek to secure</del> <u>Allocate</u> sufficient funding for the implementation of Chapter..."
3.11.4.7 Information needs to support any future allocation	PC1-3843	Support the provision	RETAIN Method 3.11.4.7.
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-3844	Support the provision with amendments	AMEND Method 3.11.4.8(a) to read: "Develop discharge allocation frameworks for individual properties and enterprises based on information collected under Method 3.11.4.7, taking into account the <u>property specific best available</u> data and <u>best</u> knowledge and technology at the time;"
3.11.4.9 Managing the effects of urban development	PC1-3846	Support the provision with amendments	AMEND Method 3.11.4.9 to reflect the sub-catchment targets.
3.11.4.10 Accounting system and monitoring	PC1-3849	Support the provision with amendments	AMEND Method 3.11.4.10 by adding " <u>a.iv. Where sub-catchments are measured in an urban setting, sites should be added upstream from urban and industrial activities.</u> " AND ADD " <u>a.v. Add new monitoring sites in each sub-catchment to collect property and enterprise specific data</u> "
3.11.5 Rules	PC1-3855	Support the provision with amendments	ADD in Rules 3.11.5 an explanatory note at the start of this section to help people understand how to find their rule.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-3929	Support the provision with amendments	AMEND Rule 3.11.5.1 clause 5 to use total land area instead of grazed area.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-3932	Support the provision with amendments	AMEND Rule 3.11.5.2 to provide an explanation in front of these rules to explain to people how to find which one applies to them. AND AMEND the rules so Schedule C is in agreement with Rule 3.11.5.2, fences require a 1 metre setback.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-3934	Support the provision with amendments	ADD a clause to allow lower emitters without and industry scheme to be permitted activities. Could be; Rule 3.11.5.3 Permitted Activity Rule - Farming activities with a Farm Environment Plan. AND AMEND to make the dates for registration, Nitrogen Reference Point 12 months after the plan is finalised. Stock exclusion and Farm Environment Plan to be pushed out accordingly.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-3935	Support the provision with amendments	AMEND to make the requirements the same as the permitted activity requirements. OR AMEND to make Rule 3.11.5.4 a permitted activity. AND AMEND realign dates as in Rule 3.11.5.3 so dates start after plan finalisation. AND AMEND so that a consent be for at least 25 years.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-3940	Oppose the provision with amendments	AMEND Rule 3.11.5.7 to allow for sub-catchment differences. AND AMEND to ensure this rule doesn't apply to the normal day to day activities within an enterprise.
Schedule A - Registration with Waikato Regional Council	PC1-3943	Oppose the provision with amendments	DELETE clause 2 of Schedule A, AND DELETE clause 3, AND DELETE clause 5(e) and 6(a)( i ), AND DELETE clause 5(f), AND DELETE clause 6(a)(ii) and (iii).
Schedule B - Nitrogen Reference Point	PC1-3947	Oppose the provision	AMEND Schedule B to ensure a Nitrogen Reference Point is only used in those catchments with an identified issue based on sub-catchment water measures. When nitrogen levels affect swimming and food gathering (an ecological limit). AND AMEND clause (c) to non-penalise an OVERSEER version change. AND AMEND to define what is meant by 'financial year' in clause (f). AND AMEND clause (f) to ensure the reference point has 7 years to choose from at least. AND AMEND clause (g) to read: "The following records...must be retained <u>for 7 years</u> and provided to the Waikato Regional Council at its request." AND AMEND to allow amalgamation of Nitrogen Reference Points on purchases of adjacent land. AND AMEND PPC1 to allow for no Nitrogen Reference Point where farms are spread across catchments and therefore it is difficult to calculate.
Schedule C - Stock exclusion	PC1-3957	Support the provision with amendments	AMEND Schedule C to incorporate the MfE Stock Exclusion Regulations AND AMEND to address stock exclusion or mitigations in Farm Environment Plans where critical source areas >15° have been identified in the Farm Environment Plan  AND AMEND clause 3. to read: "Livestock must not be permitted to enter onto or pass across the bed of the water body, except when using a livestock crossing structure <u>or as determined by the Farm Environment Plan.</u> " AND AMEND clause 3. to provide a frequency measure in here. Eg. OK to cross creek once a week AND AMEND clause 3 to name cattle, deer, pigs and horses instead of livestock AND AMEND to ensure a realistic timeframe be determined as per the Farm Environment Plan following MfE proposed regulations and dates for stock exclusion AND AMEND to ensure water bodies requiring fencing should be specified and prioritised in the Farm Environment Plan

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND so that water bodies requiring fencing should be specified and prioritised in the Farm Environment Plan AND AMEND Schedule C to allow access to natural water in exceptional circumstances for stock welfare reasons.
Schedule 1 - Requirements for Farm Environment Plans	PC1-3974	Support the provision with amendments	AMEND Schedule 1 to allow for the Farm Environment Plan to increase loss of some contaminants if the net gain for the environment is enhanced. AND ENSURE joint funding of the Farm Environment Plan if Waikato Regional Council want to hold all the information it contains. AND ENSURE clear guidance around who will have access to the information in Farm Environment Plans. AND AMEND to include an assessment of the ability of the business to pay for requirements to comply AND AMEND so that the Farm Environment Plan is used to prioritise the areas where most environmental benefit will be achieved taking into account the cost/benefit.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12543	Support the provision with amendments	AMEND Schedule 1 to allow water reticulation to be specified as a mitigation AND AMEND clause 4. by replacing mandatory timeframe with use timeframes identified within the Farm Environment Plan AND CONSIDER rates relief of compensation for the loss of productive land due to setbacks.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12541	Support the provision with amendments	AMEND clause 2(a)(i) to ensure Schedule C and Schedule 1 are in agreement about what the rules are AND AMEND clause 2(a)(ii) to read; "for areas with a slope exceeding 25°-15° and where stream fencing is impracticable, the provision of alternative mitigation measures may be used." AND AMEND clause 2(b)(iii) to allow the Farm Environment Plan to provide property specific guidelines based on Best Practicable Option for cultivation setback.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12542	Oppose the provision	DELETE Schedule 1 clause 5(a).
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-3994	Support the provision with amendments	AMEND to provide data that measures contaminants at meaningful locations to narrow down sources. AND AMEND E.coli targets throughout the table to allow for flood events. AND AMEND to ensure consistency with targets and/or better explanations around the targets. AND AMEND to provide complete data table, with relevant explanations. AND AMEND so that all contaminants allow for a cost benefit analysis at the sub-catchment level rather than application of the blanket nitrogen and stock exclusion rules.
Definition - Stock unit	PC1-4000	Oppose the provision	AMEND the Definition - Stock unit to use a more standard measurement.

## Villa Oaks Farm Ltd

Submitter ID: 74170

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4798	Support the provision with amendments	CLARIFY if existing use rights are retained under the new rules. AND CLARIFY if resource consent is required for dairy farming, while it is not being used for dairy farming should the land be valued on the current activity taking place.

## Volker, Peter

Submitter ID: 73690

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-10281	Support the provision with amendments	RETAIN PPC1 with amendments AND AMEND PPC1 to provide for 10-yearly comprehensive investigations of the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems of fresh water, and of discharges of contaminants, AND to provide for plan changes in accordance with the investigation results AND AMEND PPC1 to ensure the revenue and other benefits from an improved environment under PPC1 are valued and quantified AND CONSIDER subsidising the cost of mitigation of pollution from existing practices, while ensuring the cost of mitigation from new or increased pollution is borne by the polluter AND AMEND PPC1 to specify thresholds to indicate when a waterbody is coming under resource pressure and when a change in the management regime is required AND so that, once a threshold has been reached, all new discharges and activities that increase the total discharge are managed to maintain the limit and protect existing discharge rights from derogation AND AMEND to develop good management practice guidelines and actively advocate for them in PPC1 AND AMEND to identify values of waterbodies and set limits to protect the most stringent value on a spatial and temporal basis AND AMEND PPC1 provisions to give effect to the National Policy Statement for Freshwater Management, as required by RMA s67 (3) (a) and to ensure that water quality is as a minimum maintained as required by RMA s30 (1) (c) (ii) and (iii) AND AMEND to establish numeric limits, timeframes and targets for suspended sediment and benthic sediment attributes AND AMEND the minimum water clarity to 1.6 metres.
Background and explanation	PC1-10283	Support the provision with amendments	AMEND PPC1, including 3.11 Background and explanation, so that point source discharge consents are reviewed at the beginning of PPC1 implementation.
Objective 1: Long-term restoration and protection of water quality for	PC1-10285	Support the provision with amendments	AMEND Objective 1 so that the time frame for achieving targets is 25 years and not 80 years, AND if necessary, amending targets so they are appropriate to the time frame.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
each sub-catchment and Freshwater Management Unit			
3.11.3 Policies	PC1-10288	Support the provision with amendments	ADD a NEW policy to PPC1 which states that existing water quality is to be maintained or enhanced, including for significant and high natural character water bodies, and that an increase in water quality in one part of a catchment does not mean there can be a decrease in water quality in another part AND AMEND PPC1 to detail policies and methods for managing to the described targets, including describing responsibilities for meeting the target and how the policy will affect land users and others discharging contaminants, and how rules and resource consents will be adjusted.
3.11.4 Implementation methods	PC1-10289	Support the provision with amendments	AMEND PPC1 by providing clear direction on how the PPC1 Permitted Activities will be monitored and reviewed, and about what penalties will be imposed for breaches. AMEND PPC1 to detail policies (3.11.3) and methods (3.11.4) for managing to the set targets, including responsibilities for meeting the target and how the policy will affect land users and others discharging contaminants, and how rules and resource consents will be adjusted.
3.11.5 Rules	PC1-10290	Not stated	AMEND PPC1 Rules to make activities that are not in accordance with the requirements of the National Policy Statement for Freshwater Management, Non-complying activities. AND ADD rules that seek to reduce current stocking rates where appropriate to reduce diffuse discharges. AND AMEND rules so that there are clear activity thresholds with respect to nitrogen and other contaminants.
Schedule B - Nitrogen Reference Point	PC1-10295	Support the provision with amendments	AMEND Schedule B to ensure those with high nitrogen discharges based on OVERSEER modelling will be faced with disadvantages and restrictions to ensure nitrogen discharges are reduced.
Schedule 1 - Requirements for Farm Environment Plans	PC1-10294	Support the provision with amendments	AMEND Schedule 1 so that there is a requirement for farm practice to be audited against Farm Environment Plans, to assess the effectiveness of Farm Environment Plans in making progress towards the catchment water quality targets/limits AND AMEND to make clear that Farm Environment Plan's have provisions to prevent excess fertiliser use, over stocking and over grazing, and water issues such as over irrigation, stock access to water, and river straightening.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-10282	Support the provision with amendments	AMEND the Table 3.11-1 water quality targets and limits, and provisions of PPC1 to better give effect to the Vision and Strategy, the objectives of the Waikato Regional Policy Statement (such as for natural character and biodiversity), the National Policy Statement for Freshwater, and to ensure water quality is, as a minimum, maintained as required by the RMA. AND AMEND to establish numeric limits, timeframes and targets for suspended sediment and benthic sediment attributes AND AMEND the minimum water clarity in Table 3.11-1 to 1.6 metres AND ADD the following freshwater attributes: natural character (including the riparian margin); dissolved oxygen; deposited and suspended sediment; Te Hauora o te Taiao / the health and mauri of the environment; Freshwater Macroinvertebrate Health (Macroinvertebrate Community Index); periphyton; cyanobacteria; benthic cyanobacteria; temperature; pH; toxic heavy metals; barriers to fish migrations; water flows and levels; estuaries; and dissolved inorganic nitrogen (DIN), total nitrogen and total phosphorous in the tributaries and sub-catchments.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
5.1.5 Conditions for Permitted Activity Rule 5.1.4.11 and Standards and Terms for Controlled Activity Rules	PC1-10296	Support the provision with amendments	AMEND 5.1.5 to include freshwater objectives, attributes, limits and targets to: <ul style="list-style-type: none"> <li>a. avoid, mitigate or remedy actions during harvesting operations that accelerate erosion and minimise the discharge of sediment to water bodies;</li> <li>b. limit riparian disturbance by felling away from the riparian zone except where unsafe or impractical to do so;</li> <li>c. avoid 'more than minor' adverse effects (e.g. on aquatic habitat); and</li> <li>d. ensure that mechanical land preparation is parallel to the contour where practical.</li> </ul> AND AMEND 5.1.5 to move to a consenting regime where sufficiently clear and enforceable permitted activity conditions cannot be devised.

## Vos, Rene Alexander and Ereine Johanna

Submitter ID: 74087

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-5241	Not stated	AMEND PPC1 so it targets cities and power companies as well AND AMEND PPC1 so it deals with pests in the waterways.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-5239	Oppose the provision	AMEND Schedule 1 to exclude land from the provision stating that land over 15 degrees can't be cropped except for land dropping into streams and likely to cause erosion OR AMEND to increase slope limit. AND DELETE 5 metre setback for cropping with regard to farm drains.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-5240	Oppose the provision	AMEND Schedule 1 to exclude land from the provision stating that land over 15 degrees can't be cropped except for land dropping into streams and likely to cause erosion or revise provision to increase slope limit. (Rule 3.11.5.4) AND DELETE 5 metre setback for cropping with regard to farm drains.
Schedule B - Nitrogen Reference Point	PC1-5229	Oppose the provision	REMOVE grandparenting of nitrogen. Schedule B AND REMOVE use of the OVERSEER Model AND develop a better tool for estimating rates of leaching.
Schedule 1 - Requirements for Farm Environment Plans	PC1-5237	Oppose the provision	AMEND Schedule 1 to exclude land from the provision stating that land over 15 degrees can't be cropped except for land dropping into streams and likely to cause erosion or revise provision to increase slope limit AND DELETE 5 metre setback for cropping with regard to farm drains.



## Voyce, Peter and Pam

Submitter ID: 73983

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule C - Stock exclusion	PC1-4296	Oppose the provision	AMEND Schedule C in PPC1 so that a targeted approach is undertaken. This would involve testing water to identify those farms that are contributing the highest levels of contamination. This will enable Council to work on a case by case basis.

## Waahi Pa Marae Committee

Submitter ID: 73751

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-10897	Support the provision	Other than the specific decisions sought in this submission, only undertake amendments to Part A, Part B, Part C and Part D of PPC1 where those amendments will: 1. align with this submission's specific submission points; 2. strengthen and enhance PPC1 to achieve the Vision and Strategy; 3. assist in protecting the Values and achieving the Objectives within PPC1; 4. enable flexibility to achieve (and where possible exceed) water quality objectives of the Vision and Strategy earlier than the 80-year timeframe; 5. protect positive gains in achieving or exceeding water quality targets and maintain momentum to further improve water quality; 6. provide for reviews of PPC1 should water quality objectives not be achieved within the given timeframes; 7. provide appropriate support and resourcing to all sectors of the wider community so that the objectives of PPC1; and 8. align with the Waikato-Tainui Environmental Plan 'Tai Tumu, Tai Pari, Tai Ao' and Whakatupuranga 2050.
3.11.2 Objectives	PC1-12114	Support the provision	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units.</u> <u>Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u> " AND ADD Reasons for adopting Objective 6 to read: " <u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u> "
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-12107	Support the provision with amendments	RETAIN the 80-year timeframe in Objective 1. AND AMEND Objective 1 to read: " <u>By 2096, at the latest, or sooner where practicable, discharges of nitrogen...</u> "
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-12108	Support the provision with amendments	AMEND Objective 2 to read: " <u>Objective 2: Social, economic, spiritual and cultural well-being and prosperity is maintained in the long term...</u> "

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			Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> ."
Objective 3: 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	PC1-12111	Support the provision	RETAIN Objective 3.
Objective 4: People and community resilience	PC1-12112	Support the provision	RETAIN Objective 4.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-12113	Support the provision	RETAIN Objective 5.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12115	Support the provision	RETAIN Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12116	Support the provision	RETAIN Policy 2.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-12117	Support the provision	RETAIN Policy 3.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-12118	Support the provision	RETAIN Policy 4.
Policy 5: Staged approach	PC1-12119	Support the provision	RETAIN Policy 5.
Policy 6: Restricting land use change	PC1-12120	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 <del>generally</del> not be granted. Land use change consent... that demonstrate <del>clear and enduring</del> <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> "

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Policy 7: Preparing for allocation in the future	PC1-12121	Support the provision with amendments	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and <del>any</del> future property or... pathogens that <del>will</del> <u>may</u> be required by... that will assist in <del>defining 'land suitability'</del> <u>preparing any new allocation or management regime</u> . ... c. Minimise social disruption and costs in transition to <del>the 'land suitability'</del> any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability <del>will</del> <u>may</u> consider the following criteria:.. c. the natural capacity of the <del>landscape</del> <u>within a sub-catchment</u> to attenuate contaminant loss; and..."
Policy 8: Prioritised implementation	PC1-12124	Support the provision	RETAIN Policy 8.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-12125	Support the provision	RETAIN Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-12126	Support the provision with amendments	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, <del>provide</del> <u>have regard to the continued operation of:</u> a. <del>Continued operation of</del> regionally significant infrastructure'; and b. <del>Continued operation of</del> regionally significant industry'."
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-12128	Support the provision	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects <del>to</del> <u>from</u> point source discharges... Require any person undertaking a point source discharge... effects of the discharge <del>at the time a resource consent application is decided</del> . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to <del>lessen any</del> <u>by offsetting</u> residual adverse effects of the discharge..."
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-12131	Support the provision with amendments	AMEND Policy 12 to read: "Consider the contribution made by a... microbial pathogen <del>catchment</del> loads <u>within a sub-catchment</u> and the impact of that contribution on the <del>likely</del> achievement of the... <del>d. The diminishing return on investment in the treatment plant upgrades in respect of any resultant reduction in nitrogen, phosphorus, sediment or microbial pathogens when treatment plant processes are already achieving a high level of contaminant reduction through the application of the Best Practicable Option*.</del> "
Policy 13: Point sources consent duration	PC1-12133	Support the provision with amendments	AMEND Policy 13 to read: "When determining the... a. <del>A consent term exceeding 25 years, where</del> <u>The applicant demonstrates the approaches...</u> "
Policy 14: Lakes Freshwater Management Units	PC1-12135	Support the provision with amendments	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."
Policy 17: Considering the wider context of the Vision and Strategy	PC1-12138	Support the provision	RETAIN Policy 17.
3.11.4 Implementation methods	PC1-12162	Support the provision with amendments	ADD a NEW Method to read: " <u>3.11.4.13 Decision support system</u> <u>The Waikato Regional Council working with regional stakeholders will:</u> <u>a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u> <u>For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented</u>

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			at a <b>sub-catchment, property and enterprise</b> level - to reducing the diffuse discharge of <u>contaminants within the sub-catchment where <b>property and/or enterprise</b> is located.</u> "
3.11.4.1 Working with others	PC1-12141	Support the provision with amendments	AMEND Method 3.11.4.1 to read: "Working with <del>others</del> <u>Waikato and Waipā River Iwi partners and Regional Stakeholders.</u> Waikato Regional Council will work with <u>regional</u> stakeholders including..."
3.11.4.2 Certified Industry Scheme	PC1-12143	Support the provision with amendments	AMEND Method 3.11.4.2 to read: "Certified Industry Scheme... b. Oversight, and monitoring of Farm Environment Plans: c. Information <u>provision</u> sharing; d. <del>Aggregate</del> <u>Collective</u> reporting on Certified... e. <u>Process for dealing with non-compliance by the Certified Industry Scheme;</u> f. <u>Process for dealing with non-compliance by individual members of the Certified Industry Scheme;</u> <u>and</u> e-g. Consistency across the various Certified Industry Schemes."
3.11.4.3 Farm Environment Plans	PC1-12146	Support the provision with amendments	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation</u> actions to reduce those risks <del>in order</del> to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with <del>more</del> <u>standardised</u> monitoring <u>programme</u> and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on</u> risk assessment <u>and the outcome of previous monitoring results.</u> <u>Waikato Regional Council will prepare an audit schedule for undertaking robust third party audit (independent of the farmer and Certified Farm Environment Planner) and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans."</u>
3.11.4.4 Lakes and Whangamarino Wetland	PC1-12150	Support the provision with amendments	AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working with <del>others</del> stakeholders, will: a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment.</u> <del>a.b.</del> Build on the Shallow Lakes Management Plan by... <del>b.c.</del> Prepare and implement Lake Catchment Plans with community involvement which include : i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community).</u> "
3.11.4.5 Sub-catchment scale planning	PC1-12151	Support the provision with amendments	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where <del>it has been shown to be required</del> <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently.</u> Sub-catchment planning..."
3.11.4.6 Funding and implementation	PC1-12152	Support the provision	RETAIN Method 3.11.4.6.
3.11.4.7 Information needs to support any future allocation	PC1-12153	Support the provision with amendments	AMEND Method 3.11.4.7 to read: "Gather information and commission... any <del>future</del> framework for the allocation of diffuse discharges <u>by 2026</u> including: a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits <del>in the future</del> ... <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>

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3.11.4.9 Managing the effects of urban development	PC1-12155	Support the provision with amendments	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built environment <del>which anticipates and addresses</del> <u>to address the cumulative effect of urban development on water quality</u> over the long-term."
3.11.4.10 Accounting system and monitoring	PC1-12156	Support the provision with amendments	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including <del>biological</del> monitoring tools... Community Index and <u>Cultural Health Index</u> to provide the basis for... d. <del>An information</del> <u>A freshwater accounting system that accounts</u> for the diffuse discharges <del>that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges</del> <u>at the enterprise or property scale...</u> "
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-12157	Support the provision with amendments	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. <del>Review and report</del> <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.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-12158	Support the provision	RETAIN Method 3.11.4.12.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-12166	Support the provision	RETAIN Rule 3.11.5.1.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-12167	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> "
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-12168	Support the provision with amendments	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan <del>provided</del> <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 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.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-12172	Support the provision with amendments	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 <del>undertaking</del> <u>implementing and putting in place</u> mitigation actions <u>identified in Farm Environment Plan that will maintain 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 <del>shall be</del> <u>amended...</u> "

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3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-12176	Support the provision	RETAIN Rule 3.11.5.6.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-12177	Support the provision	RETAIN Rule 3.11.5.7.
Schedule A - Registration with Waikato Regional Council	PC1-12178	Support the provision with amendments	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. <u>A map of the property showing all land parcels</u> c. Legal description of the <u>individual land parcels that comprise the property or enterprise</u> as per the certificate(s) of title... 6. Properties that graze livestock must also provide <u>an additional</u> map showing:... ii. <u>Confirmation of water bodies listed in Schedule C (and provided by Waikato Regional Council in a map)</u> for stock exclusion within..."
Schedule B - Nitrogen Reference Point	PC1-12180	Support the provision with amendments	AMEND Schedule B to read: "A property or enterprise with a... b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> <del>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months)</del> <u>within the reference period</u> (specified in clause f)... f. The reference period is <u>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)</u> <del>the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable...</del> " AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions: <ul style="list-style-type: none"><li>• (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></li></ul> 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> " 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> " 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> " 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> " 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> "

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Schedule C - Stock exclusion	PC1-12184	Support the provision with amendments	<p>AMEND Schedule C to read: "Water bodies from which cattle...</p> <ul style="list-style-type: none"> <li>i. Any river that <del>is continually contains surface water</del> <u>flowing (i.e. that is not identified as an intermittently flowing river).</u></li> <li>ii. Any drain <u>(including farm drain canal)</u> that continually contains surface water.</li> <li>iii. Any wetland, including a constructed wetland <u>that has a direct connection with continuously flowing surface water."</u></li> </ul>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12186	Support the provision with amendments	<p>AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain...</p> <ul style="list-style-type: none"> <li>1.c. A list of land parcels which... <ul style="list-style-type: none"> <li>i. the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) <del>and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</del></li> <li>iii. <u>The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u></li> </ul> </li> <li>2. An assessment of the risk of diffuse discharge.. farming activities on the property <u>or enterprise,</u> and the priority of... <ul style="list-style-type: none"> <li>a. A description of where and how... <ul style="list-style-type: none"> <li>i. the <u>location and</u> provision of fencing and livestock...</li> <li>ii. for areas with a slope... is impracticable, the <u>location and</u> provision of alternative...</li> </ul> </li> <li>c. A description of the critical source areas... <ul style="list-style-type: none"> <li>i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses <del>from</del> <u>to</u> these areas through...</li> </ul> </li> <li>e. A description of nutrient management practices... <ul style="list-style-type: none"> <li>i. a nutrient budget...Waikato Regional Council; <u>and</u></li> <li><u>ii. an assessment of the assumptions used in a nutrient budget for the property and an opinion on material differences.</u></li> </ul> </li> <li>f. A description of cultivation management...</li> <li>d. <u>Establishing and</u> maintaining appropriate buffers...</li> </ul> </li> <li>3. A spatial risk map(s) at a scale that clearly shows: <ul style="list-style-type: none"> <li>a. The boundaries of the property <u>or enterprise (if different);</u> and...</li> </ul> </li> <li>4. A <u>detailed</u> description of the <u>following:</u>  <u>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></li> <li>5. A <u>detailed</u> description of the following: <ul style="list-style-type: none"> <li>a. <u>Mitigation</u> actions, timeframes and other...</li> </ul> </li> <li><u>6. A programme of works that sets out:</u> <ul style="list-style-type: none"> <li><u>a. The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</u> <ul style="list-style-type: none"> <li><u>i. Record of inspection by Waikato Regional Council staff or;</u></li> <li><u>ii. Record of inspection by Certified Industry Scheme staff; and</u></li> <li><u>iii. Record of audit by independent third party accredited auditor.</u></li> </ul> </li> </ul> </li> </ul>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<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>
Schedule 2 - Certification of Industry Schemes	PC1-12187	Support the provision with amendments	<p>AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System The application must <u>clearly demonstrate that the...</u></p> <p><del>a. the achievement of</del>the water quality targets referred to...</p> <p>c. the requirements of Rules 3.11.5.3 and 3.11.5.5; and</p> <p>d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u></p> <p>2. Has an appropriate ownership structure, governance arrangements and management (<u>including capacity and capability to undertake the coordinated management of Farm Management Plans.</u></p> <p>3. Has the in-house capability to coordinate the collective mitigation measures identified in the <u>Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</u></p> <p>4. Has the appropriate resources to achieve its function and responsibilities under 1(a), including <u>monitoring, auditing and reporting.</u></p> <p><del>35_</del> Has documented systems, processes, and...</p> <p>a. Competent and consistent performance in <u>preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></p> <p>b. Effective internal monitoring of performance, <u>including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. Robust data management <u>(both spatial and temporal)...</u></p> <p>d. ...</p> <p>e. Timely and <del>appropriate</del> <u>detailed reporting, including (but not limited to):</u></p> <p><u>i. progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></p> <p><u>ii. current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></p> <p>f. Corrective actions will be implemented <u>where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></p> <p><u>g. Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></p> <p>h. Internal quality control <u>and verification.</u></p> <p>i. The responsibilities <u>and accountability</u> of all parties to the Certified Industry Scheme are clearly stated <u>and enforced...</u></p> <p>j. An accurate and up to date register of scheme membership is <u>established and maintained ...</u></p> <p>k. ...</p> <p>l. The articles of the scheme, <u>including its register of membership</u> are available for public viewing.</p>



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			<p>B. People The application must demonstrate...</p> <p>1. <del>Those</del><u>The nominated parties responsible for generating and auditing Farm Environment Plans are Certified Farm Environment Planners suitably qualified and experienced.</u></p> <p>2. Auditing of Farm Environment Plans - <u>prepared under the Certified Industry Scheme - requirements will be undertaken by the parties that are accredited auditors and independent of the Farm...</u></p> <p>c. Farm Environment Plans The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1." Or AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.</p>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-12109	Support the provision with amendments	<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. 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 main stem and sub-catchments. AND RETAIN the 80-year numerical targets for Chlorophyll <i>a</i> 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>
Additions to Glossary of Terms	PC1-12189	Support the provision with amendments	ADD a NEW definition to read: " <u>Intermittently flowing river: Intermittently flowing river means a river or stream that, in its natural state during an average year, stops flowing on at least one occasion during the year.</u> "
Definition - Enterprise	PC1-12188	Support the provision with amendments	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..."

## Waahi Whaanui Trust

Submitter ID: 73537

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-10896	Support the provision	Other than the specific decisions sought in this submission, only undertake amendments to Part A, Part B, Part C and Part D of PPC1 where those amendments will: 1. align with this submission's specific submission points; 2. strengthen and enhance PPC1 to achieve the Vision and Strategy; 3. assist in protecting the Values and achieving the Objectives within PPC1; 4. enable flexibility to

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			achieve (and where possible exceed) water quality objectives of the Vision and Strategy earlier than the 80-year timeframe; 5. protect positive gains in achieving or exceeding water quality targets and maintain momentum to further improve water quality; 6. provide for reviews of PPC1 should water quality objectives not be achieved within the given timeframes; 7. provide appropriate support and resourcing to all sectors of the wider community so that the objectives of PPC1; and 8. align with the Waikato-Tainui Environmental Plan 'Tai Tumu, Tai Pari, Tai Ao' and Whakatapuranga 2050.
3.11.2 Objectives	PC1-11935	Support the provision	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units.</u> <u>Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u> " AND ADD Reasons for adopting Objective 6 to read: " <u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u> "
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-11922	Support the provision with amendments	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..."
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-11923	Support the provision with amendments	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being and <u>prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being and <u>prosperity.</u> "
Objective 3: 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	PC1-11926	Support the provision	RETAIN Objective 3.
Objective 4: People and community resilience	PC1-11927	Support the provision	RETAIN Objective 4.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-11930	Support the provision	RETAIN Objective 5.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-11936	Support the provision	RETAIN Policy 1.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-11938	Support the provision	RETAIN Policy 2.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-11941	Support the provision	RETAIN Policy 3.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-11943	Support the provision	RETAIN Policy 4.
Policy 5: Staged approach	PC1-11956	Support the provision	RETAIN Policy 5.
Policy 6: Restricting land use change	PC1-11959	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 <del>generally</del> not be granted. Land use change consent... that demonstrate <del>clear and enduring</del> <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> "
Policy 7: Preparing for allocation in the future	PC1-11960	Support the provision with amendments	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and <del>any</del> future property or... pathogens that <del>will</del> <u>may</u> be required by... that will assist in <del>defining 'land suitability'</del> <u>preparing any new allocation or management regime</u> . ... c. Minimise social disruption and costs in transition to <del>the 'land suitability'</del> any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability <del>will</del> <u>may</u> consider the following criteria:.. c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..."
Policy 8: Prioritised implementation	PC1-11963	Support the provision	RETAIN Policy 8.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-11966	Support the provision	RETAIN Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-11969	Support the provision with amendments	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, <del>provide</del> <u>have regard to the continued operation of:</u> a. <del>Continued operation of</del> regionally significant infrastructure'; and b. <del>Continued operation of</del> regionally significant industry'."
Policy 11: Application of Best Practicable Option and mitigation or	PC1-11970	Support the provision	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects <del>to</del> <u>from</u> point source discharges..."

Plan Section	Submission Point ID	Support or Oppose	Decision requested
offset of effects to point source discharges			Require any person undertaking a point source discharge... effects of the discharge <del>at the time a resource consent application is decided</del> . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to <del>lessen any</del> <u>by offsetting</u> residual adverse effects of the discharge..."
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-11973	Support the provision with amendments	AMEND Policy 12 to read: "Consider the contribution made by a... microbial pathogen <del>catchment</del> loads <u>within a sub-catchment</u> and the impact of that contribution on the <u>likely</u> achievement of the... d. The diminishing return on investment in the treatment plant upgrades in respect of any resultant reduction in nitrogen, phosphorus, sediment or microbial pathogens when treatment plant processes are already achieving a high level of contaminant reduction through the application of the Best Practicable Option*."
Policy 13: Point sources consent duration	PC1-11974	Support the provision with amendments	AMEND Policy 13 to read: "When determining the... a. A consent term exceeding 25 years, where <del>t</del> The applicant demonstrates the approaches..."
Policy 14: Lakes Freshwater Management Units	PC1-11977	Support the provision with amendments	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-11978	Support the provision	RETAIN Policy 16.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-11981	Support the provision	RETAIN Policy 17.
3.11.4 Implementation methods	PC1-12091	Support the provision with amendments	ADD a NEW Method to read: " <u>3.11.4.13 Decision support system</u> <u>The Waikato Regional Council working with regional stakeholders will:</u> <u>a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u> <u>For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located."</u>
3.11.4.1 Working with others	PC1-11982	Support the provision with amendments	AMEND Method 3.11.4.1 to read: "Working with <del>others</del> <u>Waikato and Waipā River Iwi partners and Regional Stakeholders.</u> Waikato Regional Council will work with <u>regional</u> stakeholders including..."
3.11.4.2 Certified Industry Scheme	PC1-12080	Support the provision with amendments	AMEND Method 3.11.4.2 to read: "Certified Industry Scheme... b. Oversight, and monitoring of Farm Environment Plans: c. Information <u>provision</u> <u>sharing</u> ; d. <del>Aggregate</del> <u>Collective</u> reporting on Certified... e. <u>Process for dealing with non-compliance by the Certified Industry Scheme;</u> f. <u>Process for dealing with non-compliance by individual members of the Certified Industry Scheme;</u> <u>and</u> e-g. Consistency across the various Certified Industry Schemes."

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.4.4 Lakes and Whangamarino Wetland	PC1-12082	Support the provision with amendments	AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working with <del>others</del> stakeholders, will: a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment.</u> <del>a-b.</del> Build on the Shallow Lakes Management Plan by... <del>b-c.</del> Prepare and implement Lake Catchment Plans with community involvement which include : i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community).</u> "
3.11.4.5 Sub-catchment scale planning	PC1-12083	Support the provision with amendments	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where <del>it has been shown to be required</del> <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently.</u> Sub-catchment planning..."
3.11.4.6 Funding and implementation	PC1-12084	Support the provision	RETAIN Method 3.11.4.6.
3.11.4.7 Information needs to support any future allocation	PC1-12085	Support the provision with amendments	AMEND Method 3.11.4.7 to read: "Gather information and commission... any <del>future</del> framework for the allocation of diffuse discharges <u>by 2026</u> including: a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits <del>in the future</del> ... iv. Detailed evaluation of the range of options (including economic instruments) that are available <u>to allocate rights to discharge contaminants from land use.</u> "
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-12086	Support the provision with amendments	AMEND Method 3.11.4.8 to read: "...b. Use <del>this to inform future</del> <u>the best available information to develop</u> changes to the Waikato Regional Plan <u>by 2026</u> to manage discharges..."
3.11.4.9 Managing the effects of urban development	PC1-12087	Support the provision with amendments	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built environment <del>which anticipates and addresses</del> <u>to address the cumulative effect of urban development on water quality</u> over the long-term."
3.11.4.10 Accounting system and monitoring	PC1-12088	Support the provision with amendments	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including <del>biological</del> monitoring tools... Community Index and <u>Cultural Health Index</u> to provide the basis for... d. <del>An information</del> <u>A freshwater accounting system that accounts</u> for the diffuse discharges <del>that supports the management of nitrogen, phosphorus, sediment and microbial pathogens</del> <u>diffuse discharges</u> at the enterprise or property scale..."
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-12089	Support the provision with amendments	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. <del>Review and report</del> <u>Report on the progress towards and achievement of the 10-year (Objective 3) and 80-year (Objective 1) water quality objectives of Chapter 3.11</u> <del>targets in 2020 and 2024.</del> " AND DELETE 3.11.4.11 b.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-12090	Support the provision	RETAIN Method 3.11.4.12.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-12092	Support the provision	RETAIN Rule 3.11.5.1.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-12093	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> "
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-12094	Support the provision with amendments	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan <del>provided</del> <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 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.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-12095	Support the provision with amendments	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 <del>undertaking</del> <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 <del>shall be</del> amended..."
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-12096	Support the provision	RETAIN Rule 3.11.5.6.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-12097	Support the provision	RETAIN Rule 3.11.5.7.
Schedule A - Registration with Waikato Regional Council	PC1-12098	Support the provision with amendments	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. <u>A map of the property showing all land parcels</u> c. Legal description of the <u>individual land parcels that comprise the property or enterprise</u> as per the certificate(s) of title... 6. Properties that graze livestock must also provide <del>a</del> <u>an additional</u> map showing:... ii. <u>Confirmation of water</u> <del>Water</del> bodies listed in Schedule C ( <u>and provided by Waikato Regional Council in a map</u> ) for stock exclusion within..."
Schedule B - Nitrogen Reference Point	PC1-12101	Support the provision with amendments	AMEND Schedule B to read: "A property or enterprise with a... b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> <del>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months)</del> <u>within the reference period</u> (specified in clause f)... f. The reference period is <del>an average of the five years between</del> <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> <del>the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable...</del> "

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<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"> <li>(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></li> </ul> <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>"                      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>"                      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>"                      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>"                      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>
Schedule C - Stock exclusion	PC1-12102	Support the provision with amendments	<p>AMEND Schedule C to read: "Water bodies from which cattle...                      i. Any river that <u>is continually contains surface water flowing</u> (i.e. that is not identified as an <u>intermittently flowing river</u>).                      ii. Any drain (<u>including farm drain canal</u>) that continually contains surface water.                      iii. Any wetland, including a constructed wetland <u>that has a direct connection with continuously flowing surface water.</u>"</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12103	Support the provision with amendments	<p>AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain...                      1.c. A list of land parcels which...                      i. the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) <u>and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</u>                      iii. <u>The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u>                      2. An assessment of the risk of diffuse discharge.. farming activities on the property <u>or enterprise</u>, and the priority of...                      a. A description of where and how...                      i. the <u>location and</u> provision of fencing and livestock...                      ii. for areas with a slope... is impracticable, the <u>location and</u> provision of alternative...                      c. A description of the critical source areas...                      i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses <u>from</u> these areas through...</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; <u>and</u>  <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:  a. The boundaries of the property <u>or</u> enterprise (if different); and...</p> <p>4. A <u>detailed</u> description of the <u>following</u>:  <u>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:  a. <u>Mitigation</u> actions, timeframes and other...</p> <p>6. <u>A programme of works that sets out:</u>  <u>a. The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</u>  i. Record of inspection by Waikato Regional Council staff or;  ii. Record of inspection by Certified Industry Scheme staff; and  iii. Record of audit by independent third party accredited auditor.</p> <p>7. <u>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>8. <u>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>
Schedule 2 - Certification of Industry Schemes	PC1-12104	Support the provision with amendments	<p>AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System  The application must <u>clearly</u> demonstrate that the...</p> <p>a. <del>the achievement of</del> the water quality targets referred to...</p> <p>c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u>  d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u></p> <p>2. Has an appropriate ownership structure, governance arrangements and management (<u>including capacity and capability to undertake the coordinated management of Farm Management Plans.</u></p> <p>3. <u>Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</u></p> <p>4. <u>Has the appropriate resources to achieve its function and responsibilities under 1(a), including monitoring, auditing and reporting.</u></p> <p>35. <u>Has documented systems, processes, and...</u>  a. <u>Competent and consistent performance in preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></p>



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>b. Effective internal monitoring of performance, <u>including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. Robust data management <u>(both spatial and temporal)</u>...</p> <p>d. ...</p> <p>e. Timely and <del>appropriate</del> <u>detailed</u> reporting, including (but not limited to):</p> <p>i. <u>progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></p> <p>ii. <u>current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></p> <p>f. Corrective actions will be implemented <u>where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></p> <p>g. <u>Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></p> <p>h. Internal quality control <u>and verification.</u></p> <p>i. The responsibilities <u>and accountability</u> of all parties to the Certified Industry Scheme are clearly stated <u>and enforced</u>...</p> <p>j. An accurate and up to date register of scheme membership is <u>established and maintained</u> ...</p> <p>k. ...</p> <p>l. The articles of the scheme, <u>including its register of membership</u> are available for public viewing.</p> <p>B. People The application must demonstrate...</p> <p>1. <del>Those</del> <u>The nominated parties responsible for generating and auditing Farm Environment Plans are Certified Farm Environment Planners suitably qualified and experienced.</u></p> <p>2. Auditing of Farm Environment Plans - <u>prepared under the Certified Industry Scheme - requirements will be undertaken by the parties that are accredited auditors and independent of the Farm...</u></p> <p>c. Farm Environment Plans The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1." Or AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.</p>
<p>Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments</p>	<p>PC1-11924</p>	<p>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 <i>a</i> for the Waikato River main stem only.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			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.
Additions to Glossary of Terms	PC1-12106	Support the provision with amendments	ADD a NEW definition to read: " <u>Intermittently flowing river: Intermittently flowing river means a river or stream that, in its natural state during an average year, stops flowing on at least one occasion during the year.</u> "
Definition - Enterprise	PC1-12105	Support the provision with amendments	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..."

## Wagstaff, Nigel and Sally

Submitter ID: 71188

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-212	Oppose the provision with amendments	AMEND the PPC1 to exclude small enterprises. AND AMEND the PPC1 to include more research into pollution causing enterprises and practices (rural, urban and industrial) and provide assistance/service to improve this.
3.11.4.5 Sub-catchment scale planning	PC1-1450	Support the provision with amendments	AMEND Method 3.11.4.5 to ensure waterways are tested at water entry and exit points on each property to identify enterprises that are compromising water health.
3.11.4.10 Accounting system and monitoring	PC1-211	Support the provision with amendments	AMEND Method 3.11.4.10 to ensure waterways are tested at water entry and exit points on each property to identify enterprises that are compromising water health.
3.11.5 Rules	PC1-218	Oppose the provision	AMEND all rules 3.11.5 to allow farmers flexibility to choose stock numbers.
Schedule A - Registration with Waikato Regional Council	PC1-200	Oppose the provision	AMEND schedule A to ensure all rural properties (regardless of the size) that are eligible to undertake farming or rural activities/ or border or contain a waterway should be held accountable for water care, quality, testing and reporting rules as per any other larger property. AND DELETE the blanket approach of a stock unit tally in measuring stock numbers. AND AMEND Schedule A [or Schedule 1] to ensure Waikato Regional Council makes provision to exempt an enterprise from reporting without penalty should their efforts be 'obstructed' by a 3rd party such as a landowner and that Council be given power to negotiate/deal independently with the 3rd party to resolve the matter or have it heard and dealt with via Court.
Schedule B - Nitrogen Reference Point	PC1-165	Oppose the provision	AMEND Schedule B to allow individual property/enterprise flexibility of fertiliser application following regular soil/pasture testing rather than a blanket 'one size fits all' approach. AND AMEND Schedule B to require testing of property waterways to ascertain if or what impact an enterprise might be having on waterways.
Schedule C - Stock exclusion	PC1-173	Oppose the provision	DELETE Schedule C (2) AND AMEND to allow landowners/farmers to decide on best practice in managing water bank areas. AND DELETE Schedule C (3) and amend to allow for some waterways to be exempted from installation of stock crossings.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule 1 - Requirements for Farm Environment Plans	PC1-161	Oppose the provision	AMEND Schedule 1 to ensure legislation protects individual and enterprise privacy. AND AMEND to require Council to identify each type of enterprise with a potential contamination rating and have the enterprises prepare their farm environment plans in conjunction with the risk factor identified. AND AMEND to include those enterprises at the lower end of the risk should be allowed to self-report, whilst the industries at the higher end should undertake a more thorough reporting method. AND AMEND Schedule 1 [or Schedule A] to ensure Waikato Regional Council makes provision to exempt an enterprise from reporting without penalty should their efforts be 'obstructed' by a 3rd party such as a landowner and that Council be given power to negotiate/deal independently with the 3rd party to resolve the matter or have it heard and dealt with via Court.

## Waiawa Farms

Submitter ID: 71346

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-5809	Support the provision with amendments	AMEND PPC1 to adopt clear, effective, best management practice-based rules that apply to everyone fairly and equally. AND AMEND to ensure that if future allocation is adopted, like land should be treated alike and based on a consistent foundation such as Land Use Capability. AND AMEND to remove the grandparenting approach to allocating the right to discharge. AND AMEND to remove the land use change restrictions. AND AMEND to adopt an alternative allocation tool that is not the OVERSEER Model.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12953	Oppose the provision	DELETE Policy 2(c).
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12954	Support the provision	RETAIN Policy 2(d).
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-5810	Oppose the provision with amendments	AMEND Policy 2 to replace or supplement Farm Environment Plans with sound, sensible Best Management Practices for all land use activities to be adopted within workable but prompt timeframes.
Policy 6: Restricting land use change	PC1-5811	Oppose the provision	DELETE Policy 6.
Policy 7: Preparing for allocation in the future	PC1-5813	Support the provision with amendments	AMEND Policy 7 to include a clearer transition toward a non-grandparented approach to allocation within the life of PPC1 to create certainty for land users.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-5815	Support the provision with amendments	RETAIN Rule 3.11.5.1, OR AMEND to combine Rule 3.11.5.1 with Rule 3.11.5.2.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-5817	Support the provision with amendments	RETAIN Rule 3.11.5.2 AND AMEND to include region-wide Best Management Practice-based rules to be followed on all rural properties, including those under 20 hectares.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-5820	Oppose the provision	AMEND Rule 3.11.5.3 to a Best Management Practice approach with permitted activity conditions above which a consent would be required.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-5823	Oppose the provision	AMEND Rule 3.11.5.4 so that farming activities are permitted, subject to application of practical Best Management Practices that are known to improve water quality. AND AMEND to incorporate the minimum standards in the Farm Environment Plan into the rules, including the information requirements contained in the Farm Environment Plan. AND AMEND to remove the reliance on Nitrogen Reference Points and the OVERSEER Model as a method for assessing compliance.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-5831	Oppose the provision	REPLACE Rule 3.11.5.5 with a Best Management Practice approach.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-5834	Oppose the provision with amendments	AMEND Rule 3.11.5.6 so that the matters of control ensure Best Management Practice is applied to applicants for resource consent.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-5835	Oppose the provision	DELETE Rule 3.11.5.7 and REPLACE with robust Best Management Practice-based rules that apply to all farmers regardless of current use practices.
Schedule B - Nitrogen Reference Point	PC1-5838	Oppose the provision	DELETE Schedule B and reference to Nitrogen Reference Points. OR AMEND so that Nitrogen Reference Points are used as an information gathering tool only.
Schedule C - Stock exclusion	PC1-5839	Support the provision with amendments	AMEND Schedule C to require fencing of stock in a short timeframe for easy country, but develop practical timeframes, and potentially exemptions, for steep extensive hill country.
Schedule 1 - Requirements for Farm Environment Plans	PC1-5850	Oppose the provision	AMEND to replace Farm Environment Plans with a Best Management Practice approach to be implemented immediately. OR AMEND Schedule 1 to include specific and straight-forward actions that are known to be viable and reduce contaminant loss.
Schedule 2 - Certification of Industry Schemes	PC1-5851	Oppose the provision	DELETE Schedule 2
Definition - Arable cropping	PC1-5852	Oppose the provision with amendments	REMOVE the arbitrary delineation between different forms of cropping that have very similar effects. (Definition - Arable Cropping)
Definition - Commercial vegetable production	PC1-5853	Oppose the provision with amendments	REMOVE the arbitrary delineation between different forms of cropping that have very similar effects. (Definition - Commercial vegetable production)

## Waikato and Waipa Branches of the New Zealand Deer Farmers Association

Submitter ID: 74008

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-9351	Not stated	WITHDRAW PPC1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-9490	Support the provision with amendments	AMEND Policy 2(e) to read: "e. Requiring stock exclusion to be completed <del>within 3 years following the dates by which</del> <u>according to a schedule of work as identified in a Farm Environment Plan which</u> must be provided to the Council, <del>or in any case</del> no later than 1 July 2026."
Policy 6: Restricting land use change	PC1-9473	Oppose the provision with amendments	AMEND Policy 6 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 AND AMEND to ensure changes in land use occur within the sustainable level for a sub-catchment AND ENSURE 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 is taken into account AND AMEND to provide for increases in nitrogen discharge where land use change will result in overall improvement in sustainable management and decreases in soil loss, phosphorus loss, management of microbial pathogens and enhancement of biodiversity.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-9579	Support the provision with amendments	AMEND Rule 3.11.5.1(2) to read: "Cattle, horses, deer and pigs are excluded from water bodies <del>in</del> <u>conformance with Schedule C according to a schedule of work as identified in a Farm Environment Plan; and...</u> "
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-9380	Support the provision with amendments	AMEND Rule 3.11.5.2(2) to read: "Cattle, horses, deer and pigs are excluded from water bodies <del>in</del> <u>conformance with Schedule C and Conditions 3 (e) and 4 (e) of this Rule according to a schedule of work as identified in a Farm Environment Plan; and...</u> " AND AMEND Rule 3.11.5.2 to give effect to objectives and policies including Policy 1 and Policy 4, and enable activities with lower contaminant discharges including nutrient discharges to continue or to be established.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-9654	Support the provision with amendments	AMEND Rule 3.11.5.3(3) to read: "Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C"
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-9381	Support the provision with amendments	AMEND Rule 3.11.5.4(5)(d) to read: "Cattle, horses, deer and pigs are excluded from water bodies <del>in</del> <u>conformance with Schedule C according to a schedule of work as identified in a Farm Environment Plan...</u> " AND DELETE reference to the 75th percentile nitrogen leaching value AND AMEND to ensure that all land leaching above the sustainable level is required to reduce discharges over time and at a rate that is commensurate with their contribution to the total load and taking into account economic considerations AND AMEND to incorporate reference to the sustainable nitrogen leaching number by LUC class.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-9487	Oppose the provision	AMEND Rule 3.11.5.7 to ensure it does not apply to land use change where it does not exceed the sustainable nitrogen discharge level for the sub-catchment or where the discharge is within the land's natural capability. AND AMEND the consenting period to 25 years from the date the consent is granted.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-12310	Oppose the provision	No specific decision sought for Schedule B.
Schedule C - Stock exclusion	PC1-9582	Oppose the provision	DELETE Schedule C.
Schedule 1 - Requirements for Farm Environment Plans	PC1-9602	Oppose the provision with amendments	AMEND Schedule 1.A.2(a)(i) to read: "the provision of fencing and livestock crossing structures to achieve compliance with Schedule C; and..." AND AMEND Schedule 1 to allow slope thresholds to be practically assessed on-farm as guidelines with some margin for error of interpretation to account for within paddock slope variation.

## Waikato and Waipa River Iwi

Submitter ID: 74035

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4742	Support the provision	RETAIN and AMEND PPC1 as detailed in the specific submission points.
General	PC1-13187	Not stated	RECOGNISE and account for in PPC1 the contribution of Māori land in offsetting the discharge of contaminants from other developed land, at some stage in the future. RECOGNISE and protect the investment made by landowners, particularly the owners of Māori land, to reduce contaminants discharged from land use.
General	PC1-13168	Not stated	RETAIN the general direction that is articulated through PPC1 AND RETAIN the increased controls on land use to 'hold the line' and prevent future land use intensification AND RETAIN the staged approach articulated through PPC1.
General	PC1-13169	Not stated	No specific decision requested however the submitter notes that of particular importance, is building the capacity and capability of WRC, to give effect to the methods set out in PPC1. The submitter also notes that monitoring the effectiveness of PPC1 will be important to give confidence to the regional community that we are on target to achieving the short term objectives and tracking positively towards achieving Te Ture Whaimana in 80-years.
General	PC1-13170	Not stated	No specific decision requested for PPC1, however, the submitter recognises that further plan changes will be required to achieve Te Ture Whaimana within 80 years. The submitter is clear that any future framework for the allocation of rights to discharge contaminants, will not be based on a pure grandparenting approach.
3.11.2 Objectives	PC1-3301	Support the provision	ADD a NEW Objective to read: " <u>Objective 6: Dunes, Riverine, Volcanic and Peat Lakes Freshwater Management Units.</u> <u>Restore and protect water quality within lakes by managing activities in the Lakes Freshwater Management Units to achieve the water quality attribute targets in Table 3.11-1.</u> " AND ADD Reasons for adopting Objective 6 to read: " <u>Objective 6 seeks to ensure that the water quality of all lakes within the Lakes Freshwater Management Units is restored and protected as part of achieving the Vision and Strategy. This will require the implementation of a lake-by-lake approach guided by Lake Management Plans for the management of activities in the Lakes Freshwater Management Units over the next 10 years.</u> "

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-3245	Support the provision with amendments	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..."
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-3248	Support the provision with amendments	AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> ."
Objective 3: 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	PC1-3297	Support the provision	RETAIN Objective 3.
Objective 4: People and community resilience	PC1-3298	Support the provision	RETAIN Objective 4.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-3299	Support the provision	RETAIN Objective 5.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-3304	Support the provision	RETAIN Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-3305	Support the provision	RETAIN Policy 2.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-3306	Support the provision	RETAIN Policy 3.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-3307	Support the provision	RETAIN Policy 4.
Policy 5: Staged approach	PC1-3312	Support the provision	RETAIN Policy 5.
Policy 6: Restricting land use change	PC1-3315	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 <del>generally</del> not be granted.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			Land use change consent... that demonstrate <del>clear and enduring</del> <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>
Policy 7: Preparing for allocation in the future	PC1-3320	Support the provision with amendments	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and <del>any</del> future property or... pathogens that <del>will</del> <u>may</u> be required by... that will assist in <u>defining 'land suitability' preparing any new allocation or management regime, ...</u> c. Minimise social disruption and costs in transition to <del>the 'land suitability'</del> any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability <del>will</del> <u>may</u> consider the following criteria:.. c. the natural capacity of the <del>landscape</del> <u>within a sub-catchment</u> to attenuate contaminant loss; and..."
Policy 8: Prioritised implementation	PC1-3337	Support the provision	RETAIN Policy 8.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-3340	Support the provision	RETAIN Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-3342	Support the provision with amendments	AMEND Policy 10 to read: "When deciding resource consent applications... onto or into land, <del>provide</del> <u>have regard to the continued operation of:</u> a. <del>Continued operation of</del> regionally significant infrastructure'; and b. <del>Continued operation of</del> regionally significant industry'."
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-3349	Support the provision	AMEND Policy 11 to read: "Application of Best Practicable Option and mitigation or offset of the effects <del>to</del> <u>from</u> point source discharges... Require any person undertaking a point source discharge... effects of the discharge <del>at the time a resource consent application is decided</del> . Where it is not... for the purpose of ensuring <u>net</u> positive effects on the environment to <del>lessen any</del> <u>by offsetting</u> residual adverse effects of the discharge..."
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-3353	Support the provision with amendments	AMEND Policy 12 to read: "Consider the contribution made by a... microbial pathogen <del>catchment</del> loads <u>within a sub-catchment</u> and the impact of that contribution on the <u>likely</u> achievement of the... <del>d. The diminishing return on investment in the treatment plant upgrades in respect of any resultant reduction in nitrogen, phosphorus, sediment or microbial pathogens when treatment plant processes are already achieving a high level of contaminant reduction through the application of the Best Practicable Option*."</del>
Policy 13: Point sources consent duration	PC1-3403	Support the provision with amendments	AMEND Policy 13 to read: "When determining the... a. <del>A consent term exceeding 25 years, where</del> <u>The applicant demonstrates the approaches..."</u>
Policy 14: Lakes Freshwater Management Units	PC1-3404	Support the provision with amendments	AMEND Policy 14 to read: "Restore and protect lakes... collecting and using data and information to support <u>improving</u> the management of <u>land use</u> activities <u>within</u> the lakes Freshwater Management..."
Policy 16: Flexibility for development of land returned under Te Tiriti o	PC1-3405	Support the provision	RETAIN Policy 16.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Waitangi settlements and multiple owned Māori land			
Policy 17: Considering the wider context of the Vision and Strategy	PC1-3406	Support the provision	RETAIN Policy 17.
3.11.4 Implementation methods	PC1-3519	Support the provision with amendments	ADD a NEW Method to read: " <u>3.11.4.13 Decision support system</u> The Waikato Regional Council working with regional stakeholders will: a. <u>Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u> For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a <b>sub-catchment, property and enterprise</b> level - to reducing the diffuse discharge of contaminants within the sub-catchment where <b>property and/or enterprise</b> is located."
3.11.4.1 Working with others	PC1-3407	Support the provision with amendments	AMEND Method 3.11.4.1 to read: "Working with <del>others</del> <u>Waikato and Waipā River Iwi partners and Regional Stakeholders.</u> Waikato Regional Council will work with <u>regional</u> stakeholders including..."
3.11.4.2 Certified Industry Scheme	PC1-3408	Support the provision with amendments	AMEND Method 3.11.4.2 to read: "Certified Industry Scheme... b. Oversight, and monitoring of Farm Environment Plans: c. Information <u>provision</u> sharing; d. <del>Aggregate</del> <u>Collective</u> reporting on Certified... e. <u>Process for dealing with non-compliance by the Certified Industry Scheme;</u> <u>f. Process for dealing with non-compliance by individual members of the Certified Industry Scheme;</u> <u>and</u> e-g. Consistency across the various Certified Industry Schemes."
3.11.4.3 Farm Environment Plans	PC1-3409	Support the provision with amendments	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation</u> actions to reduce those risks <del>in order</del> to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with <del>more</del> <u>standardised</u> monitoring <u>programme</u> and then <u>potentially</u> moving to <u>less frequent</u> monitoring based on <u>risk assessment and the outcome of previous monitoring results.</u> <u>Waikato Regional Council will prepare an audit schedule for undertaking</u> robust third party audit (independent of the farmer and Certified Farm Environment Planner) <u>and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans."</u>
3.11.4.4 Lakes and Whangamarino Wetland	PC1-3410	Support the provision with amendments	AMEND Method 3.11.4.4 to read: "Waikato Regional Council, working with <del>others</del> <u>stakeholders</u> , will: a. <u>Review the areas demarcated as Lakes Freshwater Management Unit when an assessment of the groundwater contribution to each Lake is determined and compared with the surface water catchment.</u> <del>a-b.</del> Build on the Shallow Lakes Management Plan by... <del>b-c.</del> Prepare <u>and implement Lake Catchment Plans with community involvement which include</u> : i. A vision for the lake developed in consultation with <u>relevant stakeholders (including the community).</u> "

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.4.5 Sub-catchment scale planning	PC1-3418	Support the provision with amendments	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with <u>relevant stakeholders</u> to develop... and where <del>it has been shown to be required</del> <u>developing a plan would result in achieving the 10-year water quality attribute targets more efficiently.</u> Sub-catchment planning..."
3.11.4.6 Funding and implementation	PC1-3419	Support the provision	RETAIN Method 3.11.4.6.
3.11.4.7 Information needs to support any future allocation	PC1-3421	Support the provision with amendments	AMEND Method 3.11.4.7 to read: "Gather information and commission... any <del>future</del> framework for the allocation of diffuse discharges <u>by 2026</u> including: a. Implementing processes... support the setting of property or enterprise-level diffuse discharge limits <del>in the future</del> ... iv. Detailed evaluation of the range of options (including economic instruments) that are available <u>to allocate rights to discharge contaminants from land use.</u> "
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-3423	Support the provision with amendments	AMEND Method 3.11.4.8 to read: "...b. Use <del>this to inform future</del> <u>the best available information to develop</u> changes to the Waikato Regional Plan <u>by 2026</u> to manage discharges..."
3.11.4.9 Managing the effects of urban development	PC1-3424	Support the provision with amendments	AMEND Method 3.11.4.9 to read: "a. Continue to work... of the built environment <del>which anticipates and addresses</del> <u>to address the cumulative effect of urban development on water quality over the long-term.</u> "
3.11.4.10 Accounting system and monitoring	PC1-3425	Support the provision with amendments	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including <del>biological</del> monitoring tools... Community Index <u>and Cultural Health Index</u> to provide the basis for... d. <del>An information</del> <u>A freshwater accounting system that accounts for the diffuse discharges that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at the enterprise or property scale...</u> "
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-3428	Support the provision with amendments	AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation... a. <del>Review and report</del> <u>Report on the progress towards and achievement of the 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.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-3429	Support the provision	RETAIN Method 3.11.4.12.
3.11.5 Rules	PC1-3520	Support the provision with amendments	AMEND the heading of Rule 3.11.5 to read: "3.11.5 <u>Land Use</u> Rules/Nga Ture."
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-3521	Support the provision	RETAIN Rule 3.11.5.1.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-3522	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> "

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-3523	Support the provision with amendments	AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan <del>provided</del> <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 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.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-3524	Support the provision with amendments	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 <del>undertaking</del> <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 <del>shall be</del> amended..."
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-3525	Support the provision	RETAIN Rule 3.11.5.6.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-3526	Support the provision	RETAIN Rule 3.11.5.7.
Schedule A - Registration with Waikato Regional Council	PC1-3527	Support the provision with amendments	AMEND Schedule A to read: "Properties with an area greater than 2 hectares... 5. All property owners must provide:... b. <u>A map of the property showing all land parcels</u> c. Legal description of the <u>individual land parcels that comprise the property or enterprise</u> as per the certificate(s) of title... 6. Properties that graze livestock must also provide <del>an</del> <u>additional</u> map showing:... ii. <u>Confirmation of water</u> <del>Water</del> bodies listed in Schedule C (and provided by Waikato Regional Council in a map) for stock exclusion within..."
Schedule B - Nitrogen Reference Point	PC1-3530	Support the provision with amendments	AMEND Schedule B to read: "A property or enterprise with a... b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> <del>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period</del> (specified in clause f)... f. The reference period is <del>an average of the five years between</del> <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) the two financial years covering 2014/2015 and 2015/2016</u> , except for commercial vegetable..." AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions:

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<ul style="list-style-type: none"> <li>(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></li> </ul> <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 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>
Schedule C - Stock exclusion	PC1-3542	Support the provision with amendments	<p>AMEND Schedule C to read: "Water bodies from which cattle...</p> <p>i. Any river that <del>is continually contains surface water</del> <u>flowing (i.e. that is not identified as an intermittently flowing river).</u></p> <p>ii. Any drain <u>(including farm drain canal)</u> that continually contains surface water.</p> <p>iii. Any wetland, including a constructed wetland <u>that has a direct connection with continuously flowing surface water.</u>"</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-3563	Support the provision with amendments	<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) <del>and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</del></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>i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses <del>from</del> <u>to</u> these areas through...</p> <p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; <u>and</u></p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<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 maintaining appropriate buffers...</u></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); and...</u></p> <p>4. A <u>detailed description of the following:</u>  <u>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 description of the following:</u></p> <p>a. <u>Mitigation actions, timeframes and other...</u></p> <p>6. <u>A programme of works that sets out:</u>  <u>a. The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</u>  <u>i. Record of inspection by Waikato Regional Council staff or;</u>  <u>ii. Record of inspection by Certified Industry Scheme staff; and</u>  <u>iii. Record of audit by independent third party accredited auditor.</u></p> <p>7. <u>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>8. <u>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>
Schedule 2 - Certification of Industry Schemes	PC1-3668	Support the provision with amendments	<p>AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System  The application must <u>clearly demonstrate that the...</u></p> <p>a. <del>the achievement of</del>the water quality targets referred to...</p> <p>c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u></p> <p>d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u></p> <p>2. Has an appropriate ownership structure, governance arrangements and management (<u>including capacity and capability to undertake the coordinated management of Farm Management Plans.</u></p> <p>3. <u>Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</u></p> <p>4. <u>Has the appropriate resources to achieve its function and responsibilities under 1(a), including monitoring, auditing and reporting.</u></p> <p>35. <u>Has documented systems, processes, and...</u></p> <p>a. <u>Competent and consistent performance in preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>b. Effective internal monitoring of performance, <u>including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. Robust data management <u>(both spatial and temporal)</u>...</p> <p>d. ...</p> <p>e. Timely and <del>appropriate</del> <u>detailed</u> reporting, including (but not limited to):</p> <p>i. <u>progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></p> <p>ii. <u>current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></p> <p>f. Corrective actions will be implemented <u>where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></p> <p>g. <u>Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></p> <p>h. Internal quality control <u>and verification.</u></p> <p>i. The responsibilities <u>and accountability</u> of all parties to the Certified Industry Scheme are clearly stated <u>and enforced</u>...</p> <p>j. An accurate and up to date register of scheme membership is <u>established and maintained</u> ...</p> <p>k. ...</p> <p>l. The articles of the scheme, <u>including its register of membership</u> are available for public viewing.</p> <p>B. People The application must demonstrate...</p> <p>1. <del>Those</del> <u>The nominated parties responsible for generating and auditing Farm Environment Plans are Certified Farm Environment Planners suitably qualified and experienced.</u></p> <p>2. Auditing of Farm Environment Plans - <u>prepared under the Certified Industry Scheme - requirements will be undertaken by the parties that are accredited auditors and independent of the Farm...</u></p> <p>c. Farm Environment Plans The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1." Or AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.</p>
<p>Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments</p>	<p>PC1-3250</p>	<p>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 <i>a</i> for the Waikato River main stem only</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			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.
Additions to Glossary of Terms	PC1-3675	Support the provision with amendments	ADD a NEW definition to read: " <u>Intermittently flowing river: Intermittently flowing river means a river or stream that, in its natural state during an average year, stops flowing on at least one occasion during the year.</u> "
Definition - Enterprise	PC1-3674	Support the provision with amendments	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..."

## Waikato Dairy Leaders Group

Submitter ID: 74049

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-11068	Support the provision with amendments	AMEND PPC1 to RETAIN with amendments or DELETE the various provisions of PPC1 that are referred to in the detailed submission points in Attachment 1 AND AMEND to provide any further or other consequential or alternative relief that may be necessary to give effect to the relief sought in this submission.
Background and explanation	PC1-10907	Support the provision	RETAIN the provisions of PPC1 that are related to a staged approach to achieving the Vision and Strategy.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-10908	Support the provision	RETAIN intent of Objective 1 as set out in "Reasons for adopting Objective 1".
Objective 3: 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	PC1-10909	Support the provision with amendments	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 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'.
Objective 4: People and community resilience	PC1-10926	Support the provision with amendments	RETAIN the intent of Objective 4 as set out in 'Reasons for adopting Objective 4'.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-11014	Support the provision with amendments	RETAIN Policy 2 guidance that PPC1 will manage all four contaminants by tailored Farm Environment Plans that allow landowners the flexibility to manage contaminants in a way that is most cost effective for each farm AND RETAIN the approach of having the same rigour in the requirements of the two alternatives: a council-managed Controlled Activity consent or a Permitted Activity in a Certified Industry Scheme.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 5: Staged approach	PC1-10936	Support the provision	RETAIN Policy 5.
Policy 6: Restricting land use change	PC1-11011	Support the provision with amendments	RETAIN Policy 6 guidance for Non-Complying consent applications to increase discharges leaving a property.
Policy 7: Preparing for allocation in the future	PC1-10944	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: "Identify and fill information gaps to prepare for further diffuse discharge reductions and any future property or enterprise-level allocation 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 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'." 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.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-11013	Support the provision with amendments	RETAIN policy guidance for Non-Complying consent applications to change land use on tangata whenua ancestral land AND RETAIN the provision that farm management and mitigation practices on the changed land use apply the most up to date technology and knowledge to minimise contaminant discharge AND AMEND to provide that any application for land use change on tangata whenua ancestral lands demonstrate that the resulting land use has as low environmental footprint as practicable.
3.11.4.7 Information needs to support any future allocation	PC1-11009	Support the provision with amendments	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.
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-11010	Support the provision with amendments	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.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-11015	Support the provision with amendments	RETAIN the intent of Method 3.11.4.12 AND AMEND by expanding the scope AND AMEND by providing further detail about the development of guidance material for plan users in assessing, requiring and monitoring mitigation practices AND AMEND to require Waikato Regional Council to work with research agencies and industry bodies to develop a robust and peer reviewed guide on mitigations, particularly 'edge of field' mitigations such as wetlands, bunds and sediment traps AND AMEND Method 3.11.4.12 to read:



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			"3.11.4.2: Support research and dissemination of <del>best practice</del> guidelines to reduce diffuse discharges. Waikato Regional Council will: a) Develop and disseminate <del>best management practice</del> guidelines for reducing the diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens; and..."
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-11026	Support the provision	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.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-11028	Support the provision	RETAIN the Rule 3.11.5.4 Controlled Activity status where farmers are assured of gaining consent, which will be subject to appropriate conditions AND RETAIN the intent to require a Farm Environment Plan that is tailored to each individual farm 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.
Schedule B - Nitrogen Reference Point	PC1-11269	Support the provision	RETAIN the Schedule B requirement for properties and enterprises over 20 hectares to calculate a Nitrogen Reference Point.

## Waikato District Council (WDC)

Submitter ID: 73418

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-3140	Oppose the provision	RE-NOTIFY PPC1 after completion of consultation with Hauraki iwi OR allow extensive period of further submission OR a variation to PPC1 is provided, to allow consideration of any further plan change amendments. WITHDRAW PPC1 OR AMEND PPC1 to incorporate alternative methodology presented in the submission.
Policy 10: Provide for point source discharges of regional significance	PC1-3129	Support the provision	RETAIN Policy 10.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-3131	Support the provision	RETAIN Policy 11.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-3132	Support the provision	RETAIN Policy 12.
Policy 13: Point sources consent duration	PC1-3137	Support the provision	RETAIN Policy 13.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-3125	Not stated	No specific decision sought for Rule 3.11.5.5.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-3118	Support the provision with amendments	AMEND Rule 3.11.5.7 with options below (or similar) <u>"is a permitted activity where</u> <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 activity (requiring resource consent)"</u>
Schedule B - Nitrogen Reference Point	PC1-3119	Support the provision with amendments	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 (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> "
Schedule C - Stock exclusion	PC1-3116	Support the provision with amendments	AMEND Schedule C, with the following, or similarly intended wording. Exclusions: The following situations are excluded from clauses 1 and 2 <u>"(III) where the stocking rate is low (less than 18 SU per ha) and:</u> <u>-the costs of exclusion are high, and;</u> <u>-other mitigation actions are taken, as approved by a Certified Farm Environment Planner"</u>
Schedule 1 - Requirements for Farm Environment Plans	PC1-3122	Support the provision with amendments	REVIEW AND AMEND all relevant PPC1 provisions to:

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>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);</p> <p>AND CONSIDER the introduction of Nitrogen Emission Constraint (NEC) methodology as part of future plan changes at least, and;</p> <p>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>
Schedule 2 - Certification of Industry Schemes	PC1-3127	Not stated	No specific decision sought for Schedule 2.

## Waikato Environment Centre

Submitter ID: 73436

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6228	Support the provision	<p>AMEND PPC1 to provide for greater urgency to be given to make the proposed changes achievable.</p> <p>AND AMEND to provide for water quality targets to reflect the Ministry of Health's definition of swimmable and safe for food gathering.</p> <p>AND AMEND to use a polluter-pays mechanism</p>
Full achievement of the Vision and Strategy will be intergenerational	PC1-6229	Oppose the provision	No specific decision was requested for Full achievement of the vision and strategy.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-6232	Oppose the provision	AMEND Objective 1 to recognise the potential off-sets to the costs of change, and the potential economic benefits, that will assist in limiting any social disruption.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-6233	Oppose the provision	AMEND Objective 2 to recognise the potential off-sets to the costs of change, and the potential economic benefits, that will assist in limiting any social disruption.
Objective 4: People and community resilience	PC1-6234	Oppose the provision	AMEND Objective 4 to recognise the potential off-sets to the costs of change, and the potential economic benefits, that will assist in limiting any social disruption.
Policy 5: Staged approach	PC1-6235	Oppose the provision	AMEND Policy 5 to recognise the potential off-sets to the costs of change, and the potential economic benefits, that will assist in limiting any social disruption.
Policy 7: Preparing for allocation in the future	PC1-6236	Oppose the provision	AMEND Policy 7 to recognise the potential off-sets to the costs of change, and the potential economic benefits, that will assist in limiting any social disruption.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.4.3 Farm Environment Plans	PC1-6237	Oppose the provision	AMEND Method 3.11.4.3 to provide for monitoring of compliance to be undertaken by a truly independent party
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-6250	Support the provision with amendments	AMEND Method 3.11.4.11 to provide for monitoring of compliance to be undertaken by a truly independent party AND ADD a transparent approach to developing, monitoring, compliance and implementation systems. AND ADD steps to ensure that effective and cost-effective monitoring, compliance and implementation capacity is in place at the time the regime is introduced. AND ADD monitoring and reporting on and reviewing of the implementation of the policy. AND ADD transparent public information for freshwater discharges and takes. AND ADD to provide for a council report every two years on progress towards meeting objectives, limits and targets. AND ADD to provide for the steps that councils will take if the combined interventions are not sufficient. AND AMEND to include provisions to set out clear consequences for non-compliance, and that sufficient resources and commitment be provided for prosecution and enforcement.
3.11.5 Rules	PC1-6242	Not stated	ADD a NEW Rule to prevent over-fertilizing AND ADD a NEW Rule to prevent over-stocking AND ADD a NEW Rule to prevent over-grazing AND ADD a NEW Rule to prevent over-watering AND ADD a NEW Rule to prevent over-draining.
Schedule B - Nitrogen Reference Point	PC1-6241	Oppose the provision	AMEND Schedule B to provide for load allocation approaches that are equitable, promote efficient resource use, future proofed and promote sustainable management. AND AMEND to provide for the use of the Land Use Capability classification system.
Schedule C - Stock exclusion	PC1-6240	Oppose the provision	AMEND Schedule C to reduce the timeframes for stock to be excluded from water ways.
Schedule 1 - Requirements for Farm Environment Plans	PC1-6238	Support the provision with amendments	AMEND Schedule 1 to provide for Farm Environment Plans to be a controlled activity. AND AMEND Schedule 1 to reduce the timeframes for a Farm Environment Plan to be put in place. AND AMEND to provide for monitoring of compliance to be undertaken by a truly independent party
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-6231	Oppose the provision	AMEND Table 3.11-1 to provide for a reduction in desired discharge levels and targets in order to achieve the community and Plan Vision. AND AMEND to provide for water quality targets that reflect the Ministry of Health's definition of swimmable and safe for food gathering. AND AMEND to include the following freshwater attribute: Te Hauora o te Taiao; natural character; dissolved oxygen (DO); deposited and suspended sediment; Freshwater Macroinvertebrate Health (MCI); periphyton; cyanobacteria; benthic cyanobacteria; Dissolved Inorganic Nitrogen (DIN) & total nitrogen in the tributaries/sub-catchments; total phosphorous in the tributaries/sub-catchments; temperature; pH; toxic heavy metals; barriers to fish migrations, and; water flows and levels. AND AMEND to include instream limits for loads, sediment loads, E.coli, toxic contaminant loads, micro-organisms and temperature. AND AMEND to provide for load thresholds in sub-catchments and catchments coming under resource use pressure.

## Waikato Federated Farmers Meat & Fibre Industry Group

Submitter ID: 73934

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-2714	Support the provision with amendments	AMEND PPC1 to give effect to the Regional Policy Statement.
Policy 13: Point sources consent duration	PC1-2711	Support the provision with amendments	AMEND PPC1 to give non-point source discharges the same level of certainty as point source discharges.
Policy 14: Lakes Freshwater Management Units	PC1-2672	Support the provision with amendments	AMEND Policy 14 to start lake restoration immediately and not in 1996, through implementation of a tailored lake-by-lake approach, guided by Lake Catchment Plans prepared over the next 10 years. AMEND PPC1 to deal with Koi Carp.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-2704	Oppose the provision	DELETE Policy 16.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-2707	Oppose the provision	DELETE Policy 17.
Schedule B - Nitrogen Reference Point	PC1-2682	Support the provision with amendments	DELETE Table 1 Schedule B Missing data Provisions OR AMEND to allow for reasonable assessment criteria.
Schedule 1 - Requirements for Farm Environment Plans	PC1-2678	Oppose the provision	DELETE Clause 5 of Schedule 1.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-2698	Oppose the provision	DELETE the E.coli restriction in Table 3.11-1.

## Waikato Focus on Peat Group

Submitter ID: 72148

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-5518	Support the provision with amendments	AMEND PPC1 to treat peat farms as a unique unit AND EXCLUDE them from PPC1 until adequate research has been carried out to understand nitrogen and phosphorus movement and identify management options AND AMEND to ensure peat farmers continue to use best management practice

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to make funding available for research to identify how much nitrogen and phosphate exits the pasture/crop root zone, the fate of nitrogen and phosphate exiting the pasture/crop root zone and mitigation options for these for various types of peat.
Policy 6: Restricting land use change	PC1-5519	Oppose the provision	AMEND Policy 6 to determine land use by the attributes of the land.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-5520	Oppose the provision	AMEND Rule 3.11.5.7 to determine land use by the attributes of the land.
Schedule B - Nitrogen Reference Point	PC1-5522	Oppose the provision with amendments	AMEND Schedule B to use the nitrogen loss figure generated per farm, according to the conditions on that farm (not according to previous usage information). AND AMEND PPC1 to invest more in science prior to making policy.
Schedule 1 - Requirements for Farm Environment Plans	PC1-5523	Support the provision with amendments	AMEND Schedule 1 (2)(b)(iii) to allow farmers to adjust setback distances as needed on a case-by-case basis as long as Farm Environment Plan outcomes are achieved AND AMEND PPC1 to recognise that managing peat soils requires different rules.

## Waikato Groundspread Association

Submitter ID: 67970

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule 1 - Requirements for Farm Environment Plans	PC1-31	Support the provision with amendments	AMEND Schedule 1/PPC1 so that approved Quality Assurance schemes and best practice technology be included in the Farm Environmental Plans as mitigation tools for the application of fertiliser and plant nutrients AND AMEND so that all fertiliser and nutrients applied to farms within the catchment of the PPC1 should be applied in a manner that meets the requirements of the Fertiliser Code of Practice – Fertmark Spreadmark and be supported by the use of technology that capture the areas that fertiliser and nutrients are applied to (Proof of Placement) AND AMEND so that the standard of Quality Assurance to meet PPC1 can also be met by Quality Assurance programs or equivalent that meet the requirements of the Fertiliser Codes of Practice AND AMEND so that the requirements of the standard of Quality Assurance must be met by all participants including Groundspread operators (fertiliser application) and farmers AND AMEND so that technology is required to support the application of fertiliser and plant nutrients to land that is covered by the identified areas with PPC1.

# Waikato Regional Council

Submitter ID: 72890

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-2970	Support the provision with amendments	AMEND every occurrence of the word Waipa to read Waipā AND AMEND every occurrence of the word Mātauranga to read <u>mātauranga</u> AND AMEND PPC1 to clarify the wording regarding the management of discharges.
Area covered by Chapter 3.11	PC1-2976	Support the provision with amendments	AMEND the Area covered by Chapter 3.11/Ngā Riu o ngā Awa o Waikato me Waipā to read: "This Chapter 3.11 applies to... This Chapter is additional to all other parts of the <u>Operative Waikato Regional Plan</u> ."
Map 3.11-1: Map of the Waikato and Waipa River catchments, showing Freshwater Management Units	PC1-3649	Support the provision with amendments	AMEND Map 3.11-1 to correct possible inconsistencies with lake mapping and classification of Lake Freshwater Management Unit <sup>^</sup> types. AND ADD an additional map at a scale sufficient to accurately map and name all Lake Freshwater Management Unit <sup>^</sup> . AND AMEND the legend to clarify the Freshwater Management Unit <sup>^</sup> status of the waterbodies shown in light blue.
Collaborative approach	PC1-2979	Support the provision with amendments	AMEND the words: He Rautaki Whakapaipai to read: "He Rautaki Whakapaipai" on page 13, under the heading 'Collaborative approach'.
Full achievement of the Vision and Strategy will be intergenerational	PC1-2980	Support the provision with amendments	AMEND the Background and Explanation; full achievement of the Vision and Strategy will be intergenerational; fourth bullet point on page 15 to read: "A <u>certification process</u> <del>accreditation system</del> to be set up for people who will assist farmers to prepare their Farm Environment Plan, and to certify agricultural industry schemes..." AND AMEND the second to last paragraph to read: "There are a range of existing provisions in <del>this</del> <u>the operative Waikato Regional</u> Plan that deal with activities that relate to forestry." AND AMEND the last paragraph to read: "In the short term, land use change from <del>tree cover</del> <u>woody vegetation</u> to farming activities, or any livestock grazing other <del>than</del> <u>than</u> dairy or arable cropping to dairy farming, ..." AND AMEND the last sentence of this paragraph (p16) to read: "...This second stage will <u>potentially include a</u> focus on land suitability and how land use impacts on water quality..."
Te Horopaki me ngā Whakamārama	PC1-2983	Support the provision	RETAIN <b>Te Horopaki me ngā Whakamārama</b>
3.11.1 Values and uses for the Waikato and Waipa Rivers	PC1-2984	Support the provision	RETAIN Section 3.11.1.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-2985	Support the provision	RETAIN Objective 1 AND AMEND Objective 1 to acknowledge climate change as required by the NPSFM.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-2989	Support the provision	RETAIN Objective 2.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 3: 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	PC1-2991	Support the provision	RETAIN Objective 3.
Objective 4: People and community resilience	PC1-2992	Support the provision	RETAIN Objective 4.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-2993	Support the provision	RETAIN Objective 5.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-2996	Support the provision	RETAIN Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-2997	Support the provision	RETAIN Policy 2 AND AMEND Policy 2 to make it explicit that those dischargers who exceed the 75th percentile nitrogen leaching value, must reduce their nitrogen losses to the 75th percentile.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-3002	Support the provision	RETAIN Policy 4.
Policy 5: Staged approach	PC1-3004	Support the provision	RETAIN Policy 5.
Policy 6: Restricting land use change	PC1-3005	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 <u>compared with what was occurring at 22 October 2016</u> , will generally not be granted. Land use change consent applications that demonstrate clear and enduring decreases in <del>existing</del> diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>compared with what was occurring at 22 October 2016</u> , will generally be granted.”
Policy 7: Preparing for allocation in the future	PC1-3006	Support the provision	RETAIN Policy 7.
Policy 8: Prioritised implementation	PC1-3058	Support the provision with amendments	AMEND Policy 8, last sentence to read: "In addition to the Priority <u>1</u> sub-catchments listed in Table 3.11-2, the 75th percentile ...."
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-3060	Support the provision	RETAIN Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-3061	Support the provision with amendments	AMEND Policy 10 to read: “a. Continued operation of regionally significant infrastructure , <u>including the need for flood and drainage infrastructure to convey water during flood events</u> ; and”



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-3062	Support the provision with amendments	AMEND Policy 11 so that flood management and drainage infrastructure are not required to mitigate contaminants that are sourced from land use activities within catchment.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-3066	Support the provision with amendments	AMEND Policy 12 to read: <u>“e. That flood and drainage infrastructure is not contributing to catchment loads but conveying water for flood management purposes.”</u> AND AMEND Policy 12 to read: "Consider the contribution... on the likely achievement of <del>the short term targets</del> <sup>^</sup> in Objective 3 <u>and the short term targets</u> <sup>^</sup> in Table 3.11-1, or the progression towards the 80 year targets <sup>^</sup> in <u>Table 3.11-1 and</u> Objective 1 taking into account:..." AND AMEND Policy 8(a) to read: "Sub-catchments where there is a greater gap between the water quality targets <sup>^</sup> in <del>Objective 1</del> ( Table 3.11-1 ) and current water quality; ..."
Policy 13: Point sources consent duration	PC1-3095	Support the provision with amendments	AMEND Policy 13(a) to read: "A consent term exceeding 25 years, where <del>the applicant demonstrates</del> the approaches set out in <del>Policies</del> <u>Policy 11 and 12</u> will be met; and..."
Policy 14: Lakes Freshwater Management Units	PC1-3097	Support the provision	RETAIN Policy 14.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-3098	Support the provision	RETAIN Policy 16.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-3099	Support the provision	RETAIN Policy 17.
3.11.4 Implementation methods	PC1-3101	Support the provision	AMEND 3.11.4 the provisions related to nitrogen management so that the methods can be implemented. AND AMEND the provisions related to commercial vegetable production so that the methods can be implemented.
3.11.4.3 Farm Environment Plans	PC1-3102	Support the provision with amendments	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare parameters and minimum requirements for the development of a certification process for <del>professionals</del> <u>Farm Environment Planners</u> to develop, certify and monitor Farm Environment Plans in a consistent approach across the region. <del>A-The</del> Farm Environment Plan <del>will be prepared by a certified person as per the requirements outlined in Schedule 1, and</del> will assess the risk of diffuse discharges of... <del>Waikato Regional Council will take a</del> risk based approach to monitoring Farm Environment Plans, starting with more frequent monitoring and then moving to monitoring based on risk assessment. Robust third party audit (independent of the <del>farmer</del> <u>landowner</u> and Certified Farm Environment Planner) and monitoring will be required."
3.11.4.4 Lakes and Whangamarino Wetland	PC1-3103	Support the provision with amendments	AMEND Method 3.11.4.4(b) to read: "Prepare and implement Lake Catchment Plans <u>for priority lakes</u> with community involvement..." AMEND Method 3.11.4.4(g) to read: "Develop a set of 10-year water quality attribute <sup>^</sup> targets <sup>^</sup> for each lake Freshwater Management Unit <sup>^</sup> <u>to develop a future plan change</u> ".
3.11.4.5 Sub-catchment scale planning	PC1-3106	Support the provision with amendments	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with others to develop ... where it has been shown to be required. Sub-catchment scale planning <del>will</del> <u>may</u> :..."

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND Method 3.11.4.5 (e) to read: "Integrate the regulatory requirements to fence waterways water bodies with the requirements for effective drainage scheme management."            AND DELETE Method 3.11.4.5 (f) in its entirety.            AND REPLACE Method 3.11.4.5 (f) with: "<u>Develop funding models for sub-catchment planning processes and mitigation actions where an individual's contribution to funding is proportional to their contribution to sub-catchment contaminant discharges.</u>"</p>
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-3111	Support the provision with amendments	AMEND Method 3.11.4.8 (b) to read: "Use this to inform future changes... to meet the <u>water quality attribute ^ targets^</u> in <u>Table 3.11-1the Objectives</u> "
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-3115	Support the provision with amendments	<p>AMEND Rule 3.11.5.1 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1            AND AMEND 3.11.5.1 (4) to read: "The farming activities do not form part of an enterprise being undertaken on more than one property <u>(unless the enterprise has a total area of less than or equal to 4.1 hectares); or</u>"            AND AMEND 3.11.5.1 (7) to read: "The farming activities do not form part of an enterprise being undertaken on more than one property <u>(unless the enterprise has a total area of less than or equal to 20 hectares)</u>"            AND AMEND 3.11.5.1(2) to read: "<u>The use of land for farming activities</u><del>cattle, horses, deer and pigs are excluded from water bodies in conformance with</del><u>complies</u> with Schedule C; and"            AND AMEND 3.11.5.1(1) to read: "The property <u>(if greater than 2 hectares)</u> is registered with the Waikato Regional Council <del>in conformance</del><u>shall comply</u> with Schedule A; and"</p>
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-3117	Support the provision with amendments	<p>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: "<del>Cattle, horses, deer and pigs are excluded from water bodies in conformance</del><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); and</u>"            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 <u>annual</u> stocking rate of the land is no greater than the stocking rate of the land <del>at</del><u>in the 12 months prior to 22 October 2016</u>. <u>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"            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 <u>on request</u> to the Waikato Regional Council <del>by 1 September</del> <u>each year.</u>"</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-3417	Support the provision with amendments	<p>AMEND Rule 3.11.5.3 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1.</p> <p>AND AMEND Rule 3.11.5.3(3) to read: "<del>The use of land for farming activities</del> <u>scattle, horses, deer and pigs are excluded from water bodies in conformance with</u> shall comply with Schedule C;"</p> <p>AND AMEND Rule 3.11.5.3 to include a specific requirement that land users must farm such that when their farming activities are modelled in OVERSEER®, the OVERSEER® nitrogen leaching loss does not exceed the Nitrogen Reference Point for the property.</p>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-3420	Support the provision with amendments	<p>AMEND Rule 3.11.5.4 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1</p> <p>AND AMEND Rule 3.11.5.4 to include a specific requirement that land users must farm such that when their farming activities are modelled in OVERSEER®, the Overseer nitrogen leaching loss does not exceed the Nitrogen Reference Point for the property</p> <p>AND AMEND to introduce provisions throughout PPC1 to enable the reassignment of Nitrogen Reference Point entitlements between properties when new land is incorporated into a property</p> <p>AND DELETE all references in PPC1 to the '5 year rolling average' (Rule 3.11.5.4 and Schedule 1)</p> <p>AND MAKE any consequential amendments to delete the definition in the Glossary in Part C</p> <p>AND AMEND to use the Nitrogen Reference Point as a yardstick to indicate the relative amount of 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, <del>unless other suitable mitigations are specified.</del>"</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 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 comply with Schedule B and <del>is has been</del> provided to the Waikato Regional Council <del>at the time the resource consent application is lodged..</del>"</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: "<del>The use of land for farming activities</del> <u>scattle, horses, deer and pigs are excluded from water bodies in conformance with</u> <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>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-3444	Support the provision with amendments	<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:</p> <ul style="list-style-type: none"> <li>• the ownership of the Nitrogen Reference Point (property or enterprise)</li> <li>• how the Nitrogen Reference Point concept can accommodate land which comes into or is taken out a commercial vegetable production enterprise.</li> </ul> <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</u> Controlled Activity Rule – Existing commercial vegetable production.</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><del>From 1 January 2020 from which date it</del> <u>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, shall be a controlled activity (requiring resource consent) subject to the following standards and termsconditions.</u></p> <p><b><u>Rule 3.11.5.5 Conditions for permitted and controlled activity:</u></b></p> <ol style="list-style-type: none"> <li>a. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</li> <li>b. A Nitrogen Reference Point is produced for the property or enterprise <del>in conformance with to</del> <u>comply</u> with Schedule B...</li> <li>c. ...</li> <li>d. ...</li> <li>e. ...</li> </ol> <p><b><u>Rule 3.11.5.5 Additional Conditions for controlled activity:</u></b></p> <ol style="list-style-type: none"> <li>f. ...</li> <li>g. ...</li> <li>h. ...”</li> </ol> <p>AND AMEND Rule 3.11.5.5(c) to read: “<del>The use of land for farming activitiescattle, horses, deer and pigs are excluded from water bodies in conformance with</del> <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>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			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.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-3477	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> "
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-3480	Support the provision with amendments	AMEND Rule 3.11.5.7 to read: " <del>Notwithstanding any other rule in the Plan</del> <u>Except as authorised under rules 3.11.5.1, 3.11.5.2, 3.11.5.3 and 3.11.5.4 any of the following changes...</u> " 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 or <u>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 <del>existing land use</del> <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 <del>livestock grazing other than dairy farming</del> <u>land use, except for commercial vegetable production</u> to dairy farming:" AND DELETE Rule 3.11.5.7(3) in its entirety.
Schedule A - Registration with Waikato Regional Council	PC1-3536	Support the provision with amendments	AMEND Schedule A to read: "Properties with an area greater than <del>2 hectares</del> <u>4.1 hectares</u> (excluding urban properties) must..." AND AMEND Schedule A clause 3 to read: " <u>Within 7 working days of a request from the Waikato Regional Council, proof of registration must be provided to the Waikato Regional Council...</u> " AND AMEND Schedule A clause 5 to read: "All <del>property</del> <u>land</u> owners must provide..."
Schedule B - Nitrogen Reference Point	PC1-3553	Support the provision	AMEND Schedule B to remove the ability for an enterprise to hold a Nitrogen Reference Point, and restrict the Nitrogen Reference Point to exist only in association with a particular parcel or property. AND AMEND to clarify whether it is the current, intended, or previous land use that determines the appropriate nitrogen reference period to use. AND AMEND clause a. to read: "The Nitrogen Reference Point must be <del>calculated</del> <u>approved</u> by a Certified Farm Nutrient Advisor..." 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 ( <del>being 12 consecutive months</del> ) within the reference..." 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 <del>2016</del> <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." AND AMEND clause f. to read: "The Nitrogen <del>R</del> Reference <del>p</del> eriod is the two... <u>except where the primary land use is</u> for commercial vegetable production in which case the reference period is 1 July

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>2006 to 30 June 2016 or such lesser, relevant period if the land was used for commercial vegetable production during only part of that period."</p> <p>AND AMEND Schedule B clause g. to read: "...</p> <p>i. <del>Stock numbers as recorded in annual accounts together with stock sale and purchase invoice</del>Records of stock numbers and stock classes, births and deaths, stock movement on and off the property, grazing records and transport records;</p> <p>ii. Dairy production data;</p> <p>iii. <del>Invoices for fertiliser applied to the land</del>Records of fertiliser type and amount, application rates and fertiliser placement records;</p> <p>iv. <del>Invoices for</del>Records of feed supplements and amount sold or purchased, and records of supplements grown and fed on farm;</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 areas irrigated (for Overseer® block setup);</p> <p>vi. <del>Records of crops grown on the land and grazed including area and yield, and including cultivation and sowing records where available; and</del></p> <p>vii. <u>A map detailing the location and area of land used for effluent irrigation;</u></p> <p>viii. <del>iii.</del> 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: "...with the settings that must be used complying with exceptions and inclusions set out in Schedule B Table 1. <u>Where another approved model is used, it will conform to the data input standards as approved by the Chief Executive of the Waikato Regional Council.</u>"</p>
Schedule C - Stock exclusion	PC1-3571	Support the provision with amendments	<p>AMEND Schedule C to ensure that it is not inconsistent with the national regulations and to ensure that together they provide for the most efficient and effective approach to stock exclusion.</p> <p>AND ADD at the end of Schedule C an advisory note to read: "<u>A reference to a river includes a reference to a stream.</u>"</p> <p>AND AMEND Schedule C to ensure consistency with Schedule 1 stock exclusion requirements.</p> <p>AND AMEND Schedule C: Exclusions to read: "The following situations are excluded from <del>clauses 1 and 2</del> clause 3."</p> <p>AND AMEND Schedule C clause 5 to read: "For land use authorised... Farm Environment Plan, <u>prepared in accordance with Schedule 1, which shall be within 3 years...</u>"</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-3575	Support the provision with amendments	<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>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<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 <del>approved</del> erosion and sediment control plan <del>constructed</del> <u>compiled by the Certified Farm Environment Planner</u> in accordance with the Erosion and Sediment Control Guidelines for Vegetable Production June 2014"</p> <p>AND AMEND Schedule 1 clause 5(a) to read: "Actions, timeframes and other measures.... or enterprise's Nitrogen Reference Point <del>unless other suitable mitigations are specified.</del>"</p> <p>OR AMEND 3.11.5.4(iii) and Schedule 1 to provide more clarity regarding how the discretion available in this provision, should be exercised.</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12544	Support the provision with amendments	<p>AMEND Schedule 1 to simplify the numbering</p> <p>AND AMEND to reflect the standards/terms/conditions in the rules</p> <p>OR DELETE the references to some of the minimum standards in Schedule 1</p> <p>OR AMEND to reflect the standards as 'best management practice' recommendations rather than firm requirements</p> <p>AND AMEND to renumber Schedule 1 clause "<del>2(f)(ii)(e)</del>" to clause "<u>2(g)</u>"</p> <p>AND AMEND to renumber clause "<del>2(f)(ii)(f)</del>" to clause "<u>2(h)</u>"</p> <p>AND AMEND Schedule 1 clause 4 to read: "A description of the actions... (having regard to their relative priority <u>and to the need for proportionality as specified in Policy 2(d) and 3(g)</u>) as well as where the mandatory..."</p> <p>AND AMEND Schedule 1 clause 2(b)(ii) to read: "Where practicable the provision... for land with a slope of <del>less</del> <u>less than 15°</u>..."</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12545	Support the provision with amendments	<p>AMEND Schedule 1 clause 2(f)(i) to read: "The identification of slopes over... from that cultivation can be <del>avoided</del> <u>minimised</u>; and"</p> <p>AND AMEND Schedule 1 Clause 2(f)(ii)(d) to read: "maintaining appropriate buffers between cultivated areas and water bodies (minimum 5m setback <u>or a lesser distance greater than 1m with appropriate mitigation measures specified in the Farm Environment Plan</u>)."</p> <p>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>
3.11.6 List of Tables and Maps	PC1-2978	Support the provision with amendments	<p>AMEND Map 3.11-1 and Map 3.11-2 so that the north-eastern area of the Waikato and Waipā River catchment that has been withdrawn is not included in the maps.</p>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-3635	Support the provision with amendments	<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</p> <p>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> <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>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<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 <u>Taniwha Rd.</u>"</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</p> <p>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>Table 3.11-2: List of sub-catchments showing Priority 1, Priority 2, and Priority 3 sub-catchments</p>	<p>PC1-3646</p>	<p>Support the provision</p>	<p>RETAIN Table 3.11-2</p> <p>AND DELETE from "Table 3.11-2 (p70): <del>Table 3.11-2: List of sub-catchments showing Priority 1, Priority 2, and Priority 3 sub-catchments</del>"</p> <p>AND AMEND Map 3.11-2 and Table 3.11-2 to combine Priority 1 sub-catchment 52 (Waitomo at Tumutumu Road) with Priority 2 sub-catchment 46 (Waitomo at SH31 Otorohanga)</p> <p>AND AMEND add to the list in Table 3.11-2 the combined area as: 'Waitomo catchment', 'Priority 1'.</p>
<p>Map 3.11-2: Map of the Waikato and Waipa River catchments, showing sub-catchments</p>	<p>PC1-3651</p>	<p>Support the provision with amendments</p>	<p>AMEND Map 3.11-2 by adding a comment to state that sub-catchment plans can include a multiple sub-catchment approach.</p> <p>AND AMEND Map 3.11-2 and Table 3.11-2 to combine Priority 1 sub-catchment 52 (Waitomo at Tumutumu Road) with Priority 2 sub-catchment 46 (Waitomo at SH31 Otorohanga)</p> <p>AND AMEND add to the list in Table 3.11-2 the combined area as: "<u>Waitomo catchment, Priority 1</u>".</p>
<p>5.1.5 Conditions for Permitted Activity Rule 5.1.4.11 and Standards and Terms for Controlled Activity Rules</p>	<p>PC1-3654</p>	<p>Support the provision</p>	<p>RETAIN 5.1.5.</p>
<p>Additions to Glossary of Terms</p>	<p>PC1-3666</p>	<p>Support the provision with amendments</p>	<p>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.</p>



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			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."
Definition - 75th percentile nitrogen leaching value	PC1-3664	Support the provision with amendments	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.
Definition - Best management practice	PC1-3665	Support the provision with amendments	AMEND the Glossary definition of best management practice to make it clear that the term includes mitigation that can also be achieved through changes to management practices.
Definition - Edge of field mitigation	PC1-3667	Support the provision with amendments	AMEND the Glossary definition of Edge of field mitigation/s to clarify which actions or technologies will be considered for funding in Method 3.11.4.5(g). AND AMEND to clarify the definition of edge of field in the definition section.
Definition - Enterprise	PC1-3671	Support the provision with amendments	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 "principal".
Definition - Livestock crossing structure	PC1-3672	Support the provision with amendments	AMEND the Glossary definition of Livestock Crossing Structure to read: "means a lawfully established structure <del>installed to allow that enables</del> livestock to cross a water body."
Definition - Nitrogen Reference Point	PC1-3673	Support the provision with amendments	AMEND the Glossary definition of Nitrogen Reference Point to read: " <del>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.</del> 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 from the incorporation of new land into a property and which are approved by the Council.
Definition - Point source discharge	PC1-3680	Support the provision with amendments	AMEND the Glossary definition of Point Source Discharge/s to exclude infrastructure that provides a conduit for water flow (e.g. flood protection and land drainage infrastructure).
Definition - Restoration	PC1-3679	Support the provision with amendments	AMEND the definition of Restoration to read: " <u>for the purposes of Chapter 3.11</u> , is the process of..."

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Definition - Stock unit	PC1-3681	Support the provision with amendments	AMEND the definition of Stock unit to read: "...energy per year, as <del>illustrated in</del> <u>determined in accordance with</u> the following stocking rate table." AND AMEND the definition to include an industry agreed stock unit criteria for pigs.
Consequential amendments to Waikato Regional Plan	PC1-3685	Support the provision with amendments	AMEND Consequential amendments to ensure the more stringent parts of 3.3.4.28 should have preference, and a new consequential amendment should be added to 3.3.4.28. AND AMEND Part D: Consequential amendment to rule 3.4.5.6 on page 90 to read: "Subject to compliance with any specified requirements, reporting through a Farm Environment Plan is a valid means of <del>supplying data under this rule</del> <u>to describe how irrigation water balances will be calculated and managed.</u> "

## Waikato River Authority

Submitter ID: 74033

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-11566	Support the provision with amendments	<p>PPC1 should be adopted in full, apart from where specific changes are requested by the submitter, AND no amendments should be made that could increase the time frames for restoration of the Waikato River or inhibit achievement of the objectives of the Vision and Strategy, nor allow any further degradation of the Waikato River in relation to the contaminants and contaminant sources addressed by PPC1.</p> <p>AMEND PPC1 to strengthen provisions for the protection of lakes and wetlands, to better support the precautionary approach advocated in the Vision and Strategy, including provisions which:</p> <ul style="list-style-type: none"> <li>• Prioritise action to protect lakes based on risk</li> <li>• Recognises that all lakes are not the same and may need different protective responses</li> <li>• For lakes that currently have water quality better than the D band, but lower than the swimmability target, sets the target higher than the current state</li> <li>• For lakes where peat staining limits clarity, accounts for this in target setting</li> <li>• Ensures all lakes are identified as Priority 1, with timeframes for Farm Plans, stock exclusion etc set appropriately to the priority</li> <li>• Ensures setbacks are appropriate to protect lakes from deterioration</li> <li>• Clarifies whether timeframes for stock exclusion from lakes are at least as good as current provisions in the Waikato Regional Plan</li> </ul> <p>AND AMEND the definition of wetlands to: "<u>Permanently or intermittently wet areas, shallow water, and land water margins that support plants that are adapted to wet conditions</u>"</p> <p>AND AMEND PPC1 to provide for a review of the point source policy, rules and methods and amend to ensure this pathway for contaminants does not increase the contaminant load to the Waikato</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>River, including consideration of a method to encourage best practice storm water technologies in urban areas.</p> <p>AND AMEND to ensure monitoring is put in place that shows the effect of permitted activity discharges</p> <p>AND AMEND monitoring provisions so that progress toward achievement of objectives is measured and to ensure the Vision and Strategy is being given effect to, including through the use of maatauranga maaori and cultural health indicators. AND ensure reporting methods should show progress in terms of giving effect to the Vision and Strategy.</p> <p>AND AMEND to ensure there are clearly understood mechanisms that allow any cumulative increase in contaminant loads to be managed</p> <p>AND ADD a policy ensuring review of methods in FMU's where water quality limits are breached or where monitoring trends show that the 10% improvement target is unlikely to be met.</p>
3.11.3 Policies	PC1-11560	Not stated	AMEND the policies to include a statement that no further degradation of water quality, or increases in the load of the four contaminants, shall occur.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-11561	Not stated	AMEND Policy 11 to explicitly require offsets and to result in a net contaminant loss improvement.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-11562	Not stated	AMEND Policy 12 to include a provision stating that no further degradation shall be permitted.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-11564	Not stated	No specific decision requested for Rule 3.11.5.3.
Schedule 1 - Requirements for Farm Environment Plans	PC1-11563	Not stated	<p>AMEND Schedule 1 to include a requirement for Farm Environment Plan actions related to the four contaminants to be implemented within a specified timeframe</p> <p>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 compliance with such plans.</p>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-11559	Not stated	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.
Additions to Glossary of Terms	PC1-11565	Not stated	ADD a definition of wetland to the additions to the glossary to read “permanently or intermittently wet areas, shallow water, and land water margins that support plants that are adapted to wet conditions” and apply this definition to rules relating to the drainage of wetlands, as contained within the operative Regional Plan.

# Waipa District Council

Submitter ID: 67704

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-3249	Support the provision with amendments	AMEND to fix rule drafting issues AND AMEND to fix nitrogen management issues AND AMEND to fix land use change issues AND ENSURE key stakeholders are informed of progress and proposals for the withdrawn section of PPC1 AND CONSIDER forms of assistance to rural landowners to help balance inequities in bearing economic costs of PPC1 AND MAKE any consequential amendments.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-3157	Support the provision	RETAIN Objective 1.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-3158	Support the provision	RETAIN Objective 2.
Objective 3: 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	PC1-3159	Support the provision with amendments	AMEND Objective 3 to read: "Short term Improvements <u>to water (ie. By 2026)...</u> "
Policy 6: Restricting land use change	PC1-3160	Oppose the provision with amendments	AMEND Policy 6 so that the first sentence reads as follows: "Except as provided for in <del>Policy</del> <u>Policies 10, 11, 12 and 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."
Policy 10: Provide for point source discharges of regional significance	PC1-3161	Support the provision	RETAIN Policy 10.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-3162	Support the provision	RETAIN Policy 11.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-3163	Support the provision	RETAIN Policy 12.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 13: Point sources consent duration	PC1-3164	Support the provision	RETAIN Policy 13.
3.11.4.6 Funding and implementation	PC1-3165	Oppose the provision with amendments	ADD the following to Method 3.11.4.6: "c. Provide sufficient staff and financial resources to work with territorial authorities within the catchments to ensure consistent and coordinated information and implementation is available to landowners and community engagement is undertaken to ensure the purposes are well understood by the community." d. Investigate methods of providing PPC1 information on LIM reports."
3.11.5 Rules	PC1-3166	Oppose the provision with amendments	AMEND Rules 3.11.5 the dates required for property registration, preparation of farm Environment Plans and calculation of Nitrogen Reference Points so that a reasonable time is allowed following PPC1 becoming operative.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-3167	Oppose the provision with amendments	AMEND Rule 3.11.5.1 to make clear how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance with rules.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-3168	Oppose the provision with amendments	AMEND Rule 3.11.5.2 to make clear how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance with rules. AND DELETE the provisions in Rule 3.11.5.2 and any other rules specifying a property or enterprise specific Nitrogen reference point be calculated and not exceeded.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-3169	Oppose the provision with amendments	AMEND Rule 3.11.5.3 to make clear how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance with rules. AND DELETE the provisions in Rule 3.11.5.3 and any other rules specifying a property or enterprise specific Nitrogen Reference Point be calculated and not exceeded.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-3170	Oppose the provision with amendments	AMEND Rule 3.11.5.4 to make clear how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance with rules. AND ADD in Rule 3.11.5.4 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 - remains in place for the duration of the consent and is secured by consent condition
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-3187	Oppose the provision with amendments	AMEND Rule 3.11.5.5 to make clear how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance with rules 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 - remains in place for the duration of the consent and is secured by consent condition

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-3189	Oppose the provision with amendments	AMEND Rule 3.11.5.6 to make clear how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance with rules AND AMEND to include in Rule 3.11.5.6 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 - remains in place for the duration of the consent and is secured by consent condition
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-3190	Oppose the provision	REPLACE Rule 3.11.5.7 with a rule that specifies that the land use changes listed 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 the existing land use. AND AMEND Rule 3.11.5.7 to make clear how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance with rules. AND ADD in Rule 3.11.5.7 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 - remains in place for the duration of the consent and is secured by consent condition 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 by the rule. Amend the rule to make it clear how it is to be administered where there is a mix of varied land use changes within the same property or enterprise.
Schedule A - Registration with Waikato Regional Council	PC1-3225	Oppose the provision with amendments	DELETE Schedule A (3). AND AMEND Schedule A (5)(b) to read: " <u>Legal descriptions and certificates of title (computer freehold registers) for all of the land in the property</u> ". AND ADD the following after Schedule A (5)(f): " <u>(g) if the property forms part of an enterprise provide the name of that enterprise</u> ".
Schedule C - Stock exclusion	PC1-3234	Oppose the provision with amendments	DELETE Schedule C and replace it with cross references to the proposed national stock exclusion regulations being produced by the Ministry for the Environment and make any necessary consequential amendments to the rules.
Schedule 1 - Requirements for Farm Environment Plans	PC1-3243	Oppose the provision with amendments	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. AND REMOVE the reference to alternative nutrient budget models.
Table 3.11-1: Short term and long term numerical water quality targets	PC1-3238	Support the provision with amendments	ADD the table number (3.11-1) in the title of the table on page 57 AND ADD a definition of 'short term' in Table 3.11-1 as 'by 2026' AND ADD a map identifying the locations of the monitoring sites in Table 3.11-1 AND ADD an explanation of gaps in the data in the table

Plan Section	Submission Point ID	Support or Oppose	Decision requested
for the Waikato and Waipa River catchments			AND CLARIFY how water quality impacts of flooding are addressed in the targets.
Definition - Certified Farm Nutrient Advisor	PC1-3239	Oppose the provision	Rationalise the definitions of 'Certified Farm Nutrient Advisor' and 'Certified Nutrient Management Advisor' in the Regional Plan and PPC1 so they are the same.
Definition - Farming activities	PC1-3241	Oppose the provision	AMEND the Glossary of terms to rationalise the definitions of 'Farming Activities' in PPC1 and the Waikato Regional Plan so that they are the same.

## Waipapa Farms Ltd and Carlyle Holdings Ltd

Submitter ID: 73863

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4599	Oppose the provision with amendments	AMEND PPC1 by changing the overly restrictive objectives, policies and rules so that they provide a balanced approach to enabling rural land owners to provide for their economic well-being, and recognise the value of primary production to the Waikato community and national community AND AMEND PPC1 provisions so they are balanced to recognise the other components of the purpose of the Resource Management Act, and not just environmental considerations AND AMEND by correcting errors (e.g typographical, grammatical, numbering errors etc) AND AMEND by improving the usability of the document, particularly the rules which are unnecessarily complex and confusing AND AMEND by being more user friendly for farmers and those implementing the plan AND AMEND by allowing use of all rural land for primary production AND AMEND by providing other relief that would address concerns and consequential relief including changes to objectives, policies, rules and definitions AND AMEND Section 32 by undertaking a comprehensive and extensive assessment and quantification of the costs and benefits of PPC1 in accordance with Section 32(2) and Section 32(2)(b) of the Resource Management Act, AND review the provisions of PPC1 as notified, based on this reassessment.
Use values - Primary production	PC1-4676	Support the provision with amendments	AMEND 3.11.1.2 Use values- Primary production to recognise the contribution of rivers to primary production to achieve not just economic well-being, but also environmental, social and cultural well-being of local communities, regionally and nationally.
3.11.2 Objectives	PC1-4689	Support the provision with amendments	ADD a NEW Objective that provides a balanced approach to enable rural land owners to provide for their economic well-being, and recognise the value of primary production activities. AND ADD a NEW Objective OR AMEND existing objectives to recognise the historical land uses and the effect of some contaminants discharged from land have a lag period.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-4677	Support the provision with amendments	AMEND Objective 1 to remove references to Table 3.11-1.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-4680	Oppose the provision with amendments	AMEND Objective 2 to recognise the importance of primary production activities to the Waikato's economy and the need for an appropriate regime to sustainably manage natural and physical resources.
Objective 3: 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	PC1-4686	Oppose the provision with amendments	AMEND Objective 3 to establish a more realistic goal, recognising that there are historic land uses affecting water quality that will continue to increase the nitrogen, phosphorus, sediment and microbial pathogens.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-4687	Oppose the provision	AMEND Objective 5 to reflect the principle of enabling stewardship and kaitiakitanga as outlined in Section 7(a) and 7(aa) of the Resource Management Act for all landowners. AND AMEND to remove impediments to the flexibility of the use of all lands.
3.11.3 Policies	PC1-4705	Support the provision with amendments	ADD a NEW Policy which identifies the non-regulatory methods for achieving the objectives such as funding, and incentives for fencing and planting of waterbodies. AND AMEND 3.11.3 Policies by recognising that there will be temporary increases in stocking rates due to breeding cycles, which are critical to farms.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12955	Oppose the provision	AMEND Policy 2 to read: "(e) Requiring a risk based approach to stock exclusion from waterbodies within a property to be completed within 3 years, or the timeframe agreed to by Council through acceptance of the Farm Environment Plan following the dates by which a Farm Environment Plan must be provided to the Council, or any case no later than 1 July 2026."
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-4694	Oppose the provision	AMEND Policy 2 to recognise other land uses contribute to high levels of contaminant discharge to water bodies and outline methods to address this AND AMEND Policy 2 to provide additional clarity AND AMEND Policy 2 to address the concerns as outlined.
Policy 5: Staged approach	PC1-4697	Support the provision with amendments	AMEND Policy 5 to recognise the economic and trade implications of PPC1.
Policy 8: Prioritised implementation	PC1-4698	Support the provision with amendments	AMEND Policy 8 (a) to define what a 'greater gap' is in terms of percentage difference, or in some manner which provides clarity.
Policy 10: Provide for point source discharges of regional significance	PC1-4700	Support the provision with amendments	AMEND Policy 10 to define Regionally Significant Infrastructure and Regionally Significant Industry.
Policy 14: Lakes Freshwater Management Units	PC1-4703	Oppose the provision	AMEND Policy 14 to provide additional clarity. AND AMEND the policy to be more balanced and recognise the value and long term benefits of primary production activities.
3.11.5 Rules	PC1-4711	Oppose the provision with amendments	AMEND 3.11.5 Rules by recognising as a permitted activity that there will be temporary increases in stocking numbers. AND AMEND 3.11.5 Rules by ensuring the rule cascade is clear and understandable for lay users of PPC1. AND AMEND the rule cascade to include a clear default Restricted Discretionary rule for change in land use not listed in the Non-Complying activity rule.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-4708	Oppose the provision	DELETE Condition 1 under Rule 3.11.5.2 AND RETAIN Condition 2 but provide additional clarity AND AMEND Condition 3 to apply to properties sized between 10 hectares and 40 hectares AND AMEND Condition 3(a) to provide clarification and improve the definition of enterprise. AND RETAIN the grandparenting rule allowing existing uses under Condition (3)(b)(i) and increase the stock unit limit. AND AMEND Condition 3(b)(i) to apply to properties sized between 10 hectares and 40 hectares AND AMEND to convert Condition 3(c) to an advisory note AND RETAIN Condition 3(e) AND AMEND Condition 4 to apply to properties sized between 10 hectares and 40 hectares AND DELETE Condition 5 AND AMEND Condition 5 to apply to properties sized between 10 hectares and 40 hectares AND DELETE Condition 5(c).
Schedule A - Registration with Waikato Regional Council	PC1-4714	Oppose the provision with amendments	AMEND Schedule A so that it is consistent with Rule 3.11.5.1. AND AMEND so that land area is increased to 10 hectares. AND AMEND to address points raised in the submission.
Schedule B - Nitrogen Reference Point	PC1-4715	Oppose the provision with amendments	AMEND Schedule B by including precise references to OVERSEER including version number. AMEND Clause f) reference period to be the 24 months following PPC1 being made operative. AND DELETE Clause g).
Schedule C - Stock exclusion	PC1-4716	Oppose the provision with amendments	AMEND Schedule C to read 1m exclusion for stock from rivers. AND AMEND to address points raised in submission.
Schedule 1 - Requirements for Farm Environment Plans	PC1-4750	Oppose the provision with amendments	AMEND Schedule 1 to address points raised in submission.
Schedule 2 - Certification of Industry Schemes	PC1-4704	Oppose the provision	AMEND Schedule 2 to ensure that the intent and purpose of a Certified Industry Scheme is outlined, rather than just listing criteria which must be met to become certified AND AMEND general typographical and grammatical errors AND AMEND to ensure there is transparency about what constitutes a Certified Industry Scheme System.
3.11.6 List of Tables and Maps	PC1-4752	Oppose the provision with amendments	RETAIN the acknowledgement that the effect of some contaminants (particularly nitrogen) discharged from land has not yet been seen in the water and there is a lag. AMEND provisions of PPC1 to reflect this.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-4678	Oppose the provision	REMOVE references to Table 3.11-1.
Definition - 75th percentile nitrogen leaching value	PC1-4641	Support the provision with amendments	AMEND Definition - 75th percentile nitrogen leaching value to read: "...and which 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 30 June 2019.</u> "
Definition - Certified Farm Environment Planner	PC1-4625	Support the provision with amendments	AMEND Definition- Certified Farm Environment Planner by providing clarity and allows for a sufficient pool of certified persons to be available to the market.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Definition - Certified Farm Nutrient Advisor	PC1-4628	Support the provision with amendments	AMEND Definition- Certified Farm Nutrient Advisor such that the definition provides clarity and allows for a sufficient pool of certified persons to be available to the market.
Definition - Certified Industry Scheme	PC1-4623	Oppose the provision	REMOVE the definition of Certified Industry Scheme and any Objectives, Policies and Rules linked to it, until further assessment and consultation is undertaken to really understand the intent, scope and application of a Certified Industry Scheme.
Definition - Enterprise	PC1-4636	Oppose the provision with amendments	AMEND Definition- Enterprise/s to only apply to properties in the same ownership and have an operational dependency on each other.
Definition - Forage crop	PC1-4638	Oppose the provision with amendments	AMEND the Definition - Forage Crop to explicitly exclude the growing of grass for the purposes of hay or silage.
Definition - Offset	PC1-4640	Oppose the provision with amendments	AMEND Definition- Offset/s to acknowledge that compensation measures may result in environmental benefits in other areas (i.e not necessarily for the same contaminant).
Definition - Stock unit	PC1-4639	Oppose the provision with amendments	AMEND the stock units under the definition, and include categories for housed animals where the animals are not grazed or accommodated on uncovered pasture 24 hours a day. This is particular the case for replacement calves that are accommodated in undercover facilities. AND AMEND to reflect other management approaches.

## Wairakei Pastoral Ltd

Submitter ID: 74095

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-11406	Support the provision with amendments	<p>The specific provisions be amended or deleted or retained or substituted as sought in Appendices A, B, C, and D attached to the submission (requested changes are also summarised in separate submission summary points under the relevant plan sections)</p> <p>AND MAKE alternative, consequential or further relief that may be required to promote sustainable management or give effect to the submission</p> <p>AND ADD a NEW Schedule 2 to read:</p> <p><b><u>"Schedule 2: Requirements for a Sub-catchment management plan</u></b></p> <p><u>The purpose of a Sub-catchment management plan is to identify the current water quality in a sub-catchment (within Table 3.11-2), whether water quality is required to be maintained, protected or restored, and methods to achieve the relevant outcome required.</u></p> <p><u>In the Waikato and Waipā River Catchments, water quality outcomes and values have been determined through the Vision and Strategy.</u></p> <p><u>Sub-catchment-management plans will take a proactive, prioritised and integrated 'whole of sub-catchment' approach to managing each subcatchment's land and water, identify specific issues and include actions to:</u></p> <ul style="list-style-type: none"> <li>• <u>Maintain or improve water quality;</u></li> <li>• <u>Conserve soil;</u></li> <li>• <u>Restore and protect important biodiversity habitats;</u></li> <li>• <u>Meet iwi aspirations for the Waikato River.</u></li> </ul>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p><u>Sub-catchment management plans are prepared by an enterprise and are intended to provide clear guidance including management actions for the preparation of <b>Farm Environment Plans</b> (as required by Schedule 1).</u></p> <p><u>A Sub-catchment management plan shall as a minimum:</u></p> <p><u>a) Identify the current water quality and water quality issues at a sub-catchment level that need to be managed to achieve the Objectives to be met;</u></p> <p><u>b) Provide details of any Decision Support Tools required to measure, model, and predict discharges from individual properties and enterprises within the sub-catchment, and how they can be related to the Table 3.11-1 freshwater objectives;</u></p> <p><u>c) Establish the principles for allocation (consistent with Policy 7) of an input load based nutrient cap at the refined sub-catchment level through the development of a relationship between land use suitability and the Table 3.11-1 water quality attribute targets for the sub-catchment;</u></p> <p><u>d) Provide for the management of nitrogen, phosphorus, sediment and microbial pathogen losses in the sub-catchment through mitigation measures to be undertaken by the consent holder to ensure that the actual or potential environmental effects of carrying out the allowed land use change (including any effects from subsequent farming activities) meet Objectives 1 and 3;</u></p> <p><u>e) Provide direction for the preparation and independent auditing of Farm Environment Plans to ensure farming activities operate at Good Management Practice (<b>GMP</b>) levels or better and other mitigation options;</u></p> <p><u>f) Provide an adaptive management approach (consistent with Schedule 3) to monitor and respond to actual or potential adverse effects of the land use change on the environment (including any effects from subsequent farming activities) and associated diffuse discharges;</u></p> <p><u>g) Provide independent validation for the predictive performance and accuracy of any Decision Support Tool;</u></p> <p><u>h) Provide direction for how any proposed land use changes are to be carried out in stages;</u></p> <p><u>i) Include a robust monitoring programme (real-time, reporting of contaminant losses in a suitable digital format) designed to monitor the actual or potential environmental effects of carrying out the land use change (including any effects from subsequent farming activities) over a period of 25 years from the grant of consent;</u></p> <p><u>j) Require annual monitoring and mitigation reports to be prepared by the consent holder and submitted to the Waikato Regional Council (in accordance with consent conditions preferred by the enterprise) within the period of three months after each anniversary of the grant of consent"</u></p> <p>ADD a NEW Schedule 3 to read:</p> <p><u>"Schedule 3: Adaptive Management Approach</u></p> <p><u>The purpose of an Adaptive Management Approach is to allow a flexible approach to the management of natural resources and to apply a learning cycle for each decision making step. Adaptive management is underpinned by predictive modelling to test a range of hypothetical options for their relative impacts on the current state.</u></p> <p><u>A management process is then informed by the stepwise learning from changes in state modelling against the predicted outcomes. This allows informed or guided decisions rather than random exercises. Adaptive management is often required when complex ecological systems are being managed and management decisions cannot wait for final research results.</u></p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>To achieve the Vision and Strategy for maintaining, protecting and restoring the health and well-being of the Waikato River (through Objectives 1 and 3), management at a sub-catchment level is required. To meaningfully reduce input loads and meet the water quality targets, a range of mitigation actions will be required, reinforced where appropriate by Decision Support Tools. An Adaptive Management Approach is required to ensure that mitigations and predictions do not lead to unintended consequences for the environment and communities, or delay vital actions from being taken to achieve the objectives. Such consequences may lead to financial costs for a community and a loss of confidence in mitigation actions. However, because predictive analysis is carried out by modelling, an Adaptive Management Approach will need to allow for adjustment of the speed at which mitigation tools are used in terms of their actual effect on water bodies. Thus depending on the available data, properties and enterprises may need to adapt their programme by accelerating or decelerating the use of mitigation depending on the monitoring results. Consent conditions should therefore provide the flexibility to achieve these outcomes.</p> <p>When preparing a Sub-catchment management plan (or Farm Environmental Plan) the plan should include the following features of adaptive management (where appropriate):</p> <ul style="list-style-type: none"> <li>a) The existing environment is established by robust baseline monitoring;</li> <li>b) The extent of the environmental risk (including the gravity of the consequences if the risk is realised) is tested by the Decision Support Tools;</li> <li>c) Effects that might arise can be remedied before they become irreversible;</li> <li>d) The plan(s) provide for effective monitoring of adverse effects using appropriate indicators;</li> <li>e) Thresholds are set to trigger remedial action(s) before the effects become overly damaging;</li> <li>f) Where advanced mitigation is undertaken, it is staged and plans require certain criteria to be met before the next stage can proceed;</li> <li>g) Where land use change is undertaken, it is staged and any management plans require certain criteria to be met before the next stage can proceed; and</li> <li>h) There is a real ability to remove all or some of the land development that has occurred if the monitoring results demonstrate criteria are not met." <p>ADD a NEW Schedule 4 to read:  "Schedule 4: Farm Mitigations for Catchment Management  The objective is to get every farm performing at Good Management Practice (GMP) level as a starting point. It is appropriate that GMP is implemented, and these are considered necessary before any additional mitigation can be provided.  The mitigation tools should be chosen by the relevant property or enterprise as to which is both practical and economic as part of either a Farm Environmental Plan or a Sub-catchment management plan.  The scheduled mitigations can be used in limiting the amount of each of the four key contaminants (in the input loads for land use management) from becoming discharges to groundwater and water bodies in the Waikato River system.  Mitigation of effects to water bodies of the four key contaminants from agricultural land have been divided based on whether they are modelled in OVERSEER or APSIM or SPASMO.</p> </li></ul>

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			<p><u>Many management and mitigation practices serve the benefit of reducing effects for a range of contaminants, and may be included in more than one table. For example, riparian planting can reduce sediment, phosphorus and pathogens from entering water bodies.</u></p> <p><u>The summary tables below identify management and mitigation tools, and indicate if they can be incorporated into OVERSEER, or APSIM or SPASMO as appropriate.</u></p> <p><u>Microbial Pathogens</u></p> <p><u>The objective of limiting the numbers of pathogens directly affecting the water is to reduce the number of animals depositing urine and faeces into water bodies either directly or indirectly by across ground transfer.</u></p> <p><u>Phosphorus (P)</u></p> <p><u>The objective of limiting the amount of P is to limit the amount which is left on the surface of the soil which is then available to be washed directly into the water bodies and to limit the amount of soil which can be washed directly into the water bodies carrying P with it.</u></p> <p><u>Nitrogen (N)</u></p> <p><u>Nitrogen is transported from below the root zone through the soil to water bodies. The objective of limiting the amount of leaching through the soil profile is to limit the amount of N within the root zone that is then able to be washed through by excess moisture. The amount of excess N within the root zone comes from the application of N fertilisers and from the high concentration of N in the urine of cattle. The prime time when leaching occurs is during the winter months when the soil profile is full of moisture. Therefore, some of the following mitigation techniques are aimed at reducing the total amount of N in the soil while some are designed to reduce the amount of N in the soil during the late autumn and winter period.</u></p> <p><u>Sediment</u></p> <p><u>Sediment carries with it phosphorus and other compounds that can have a negative effect on aquatic life and appearance (colour/clarity) of the water body. The objective of applying good management practice is to reduce the amount of sediment entering waterways that will have a negative effect on aquatic life, appearance, and recreational use."</u></p> <p>REFER to Appendix B of the submission for the accompanying tables which describe mitigation actions to manage each contaminant.</p> <p>AND MAKE alternative, consequential or further relief that may be required to promote sustainable management or give effect to the submission.</p>
General	PC1-13165	Not stated	ADD to PPC1, that the stretch of the Waikato River catchment between the Lake Taupo control gates and Ohaaki-Ohakuri should be typified as a 'river'.
General	PC1-13166	Not stated	AMEND PPC1 so objectives, policies and methods (including rules) designed for managing water quality in the stretch of the Waikato River above Ohaaki-Ohakuri are focused on "maintaining" overall freshwater quality in the sub-catchment.
General	PC1-13167	Not stated	No decision for PPC1 requested however, the submitter supports a sub-catchment based approach.
Map 3.11-1: Map of the Waikato and Waipa River catchments, showing Freshwater Management Units	PC1-11253	Support the provision with amendments	AMEND Map 3.11-1 by subdividing Sub-catchment 66 into Sub-catchments 66A and 66B as illustrated in Appendix D of the submission AND AMEND Table 3.11-1 accordingly.

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Water quality and National Policy Statement for Freshwater Management	PC1-11257	Support the provision with amendments	AMEND the second paragraph of Water Quality and National Policy Statement for Freshwater Management to read: "... The CSG concluded that ( <u>generally</u> ) from a water quality point of view, over-allocation has occurred <u>within the FMU's while in some water bodies current water quality is high. Some</u> <del>W</del> water bodies in the Waikato and Waipā River catchments are <u>therefore</u> not able to assimilate further discharges..."
Full achievement of the Vision and Strategy will be intergenerational	PC1-11259	Support the provision with amendments	AMEND the first paragraph of the Full Achievement of the Vision and Strategy will be Intergenerational section to read: "...The 80-year timeframe recognises the <del>potential</del> 'innovation gap' that means full achievement of water quality requires technologies or practices that <del>are may</del> not <del>yet be</del> available or economically feasible. In addition, the current understanding is that achieving water quality restoration requires a <del>considerable amount of</del> land to be changed from land uses with moderate and high intensity of discharges to and use with lower discharges (e.g. through <del>reforestation-mitigation</del> ) <u>within high-risk sub-catchments. Whereas in other sub-catchments it will be more appropriate to focus on applying mitigation methods via consent conditions, rather than simply preventing land use change.</u> " AND AMEND paragraph 4 and associated bullet points to read: "The ' <u>Stage 1</u> ' approach to reducing contaminant losses from pastoral farm land implemented by Chapter 3.11 requires: ... <ul style="list-style-type: none"> <li>• a property <u>or enterprise</u> scale nitrogen reference point to be established by modelling current nutrient losses from each property <u>or enterprise</u>, with nor property <u>or enterprise</u> being allowed to exceed its reference point in the future and higher dischargers being required to reduce their nutrient losses; <u>or</u></li> <li>• <u>the introduction of a refined sub-catchment based nitrogen cap.</u>"</li> </ul> AND AMEND paragraph 8 to read: "In the short term ( <u>i.e. Stage 1 = 10 years</u> ), land use change from tree cover to animal grazing ... will be constrained ( <u>but not prohibited</u> ). Provision has been made for some flexibility of land use for Māori land ... These constraints on land use change are interim until a future plan change introduces a second stage ( <u>i.e. 10-80 years</u> ), where further reductions in discharges..." AND AMEND PPC1 to consistently refer to 'property or enterprise' throughout [as opposed to just 'property']".
3.11.1 Values and uses for the Waikato and Waipa Rivers	PC1-11260	Support the provision with amendments	AMEND PPC1 to insert links (via explanatory text or advice notes) between section 3.11.1 and subsequent sections to explain the specific relationship between particular values and uses and particular freshwater objectives (ie policies and rules).
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-11261	Support the provision with amendments	AMEND Objective 1 to read: "Objective 1: Long-term <u>maintenance, restoration and/or</u> protection of water quality <u>as relevant</u> for each sub-catchment and Freshwater Management Unit... By 2096, <u>the management of</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens..."

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Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-11262	Support the provision with amendments	AMEND Objective 2 to read: "Objective 2: Social, economic and cultural well-being is <u>recognised and</u> maintained in the long term... Waikato and Waipā communities and their economy <u>experience measurable</u> benefits from the <u>maintenance</u> , restoration and/or protection <u>as relevant</u> of water quality in the Waikato River catchment..."
Objective 3: 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	PC1-11265	Support the provision with amendments	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 <u>an overall</u> 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 per cent change towards the long term water quality improvements is indicated by the short term water quality attribute targets in Table 3.11-1 <u>within each sub-catchment</u> ."
Objective 4: People and community resilience	PC1-11266	Support the provision with amendments	AMEND Objective 4 to read: "A staged approach to change enables people and communities to undertake adaptive management to continue to provide for their social, economic and cultural well-being <del>in the short term</del> while:..."
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-11267	Support the provision	RETAIN Objective 5 as notified or amended by similar wording to like effect.
Principal Reasons for Adopting Objectives 1-6	PC1-11268	Support the provision with amendments	No specific decision sought for Principal Reasons for Adopting Objectives 1-6 [However refer changes to reasons for specific objectives].
Reasons for adopting Objective 3	PC1-11270	Support the provision with amendments	AMEND the Reasons for Adopting Objective 3 to read: "Point source discharges are currently managed through <u>permitted activity rules and existing</u> resource consents, and further action required to improve the quality of these discharges will occur on a case-by-case basis at the time of consent renewal ( <u>where relevant</u> ), guided by the targets and time limits set in Objective 1."
Reasons for adopting Objective 4	PC1-11271	Support the provision with amendments	AMEND the Reasons for Adopting Objective 4 by adding the following paragraph: " <u>Encouraging enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change will provide a key method (alongside participation in any relevant Certified Industry Schemes) for achieving clear and enduring improvements in water quality.</u> "
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-11272	Support the provision with amendments	AMEND Policy 1 to read: "Manage and require <u>maintenance and/or</u> reductions <u>as relevant</u> in sub-catchment wide discharges of nitrogen, phosphorus, sediment and microbial pathogens, by:..." AND AMEND Policy 1 by adding a new final paragraph: " <u>Encouraging enterprises to apply for sub-catchment management resource consents for farming activities and commercial vegetable production, associated diffuse discharges, and land use change.</u> "
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-11273	Support the provision with amendments	DELETE paragraph (b) from Policy 2.

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Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12956	Support the provision with amendments	<p>AMEND Policy 2 to renumber paragraph (c) as (b)  AND ADD a NEW paragraph (c) to read:  <u>"Encouraging enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change; and"</u>  AND REPLACE paragraph (d) with the following:  <u>"Where an adaptive management and mitigation approach for sub-catchment management is developed, assess and calculate risk-based input loads for each contaminant at a refined sub-catchment level. The input loads will be proportional to the Objective 1 freshwater objectives related to nitrogen, phosphorus, sediment and microbial pathogens for the surface waters that each refined sub-catchment is connected to. The input load for nitrogen will replace the Nitrogen Reference Point where an enterprise based consent for sub-catchment management is sought, proportional to the properties or enterprises collectively managed under existing Nitrogen Reference Point(s) values; and"</u>  AND AMEND to renumber paragraph (e) as (f)  AND ADD a NEW paragraph (e) to read:  <u>"Identifying mitigation actions that are to be set out to achieve Objectives 1 and 3 and implemented within either a sub-catchment management plan; Farm Environment Plan; an associated resource consent; or in specific requirements established by participation in any relevant Certified Industry Scheme; and"</u>  AND ADD a NEW paragraph (g) to read:  <u>"Enterprises that reduce nitrogen, phosphorus, sediment and microbial pathogens are enabled."</u></p>
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-11277	Support the provision with amendments	<p>AMEND Policy 3(d) to read:  <u>"A 10% decrease in the diffuse discharge of nitrogen during Stage 1 and a tailored reduction approach in the diffuse discharge of phosphorus, sediment and microbial pathogens is achieved across the sector through the implementation of Best or Good Management Practices; and"</u></p>
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-11344	Support the provision with amendments	<p>ADD the following paragraph to Policy 4: <u>"Enabling enterprises to apply for sub-catchment management resource consent applications which include lower discharges from farming activities and commercial vegetable production, associated diffuse discharges, and land use change, will provide a key method (alongside participation in any relevant Certified Industry Schemes) for achieving clear and enduring improvements in water quality in order to meet (inter alia) Objectives 1 and 3 while allowing existing activities to continue and enabling new activities to be established."</u></p>
Policy 5: Staged approach	PC1-11345	Support the provision with amendments	<p>ADD the following to Policy 5: <u>"Ensuring that resource consent applications for farming activities and land use change include an appropriate assessment of risk and uncertainty based on sound adaptive management criteria. Encouraging enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change, will provide a key method (alongside participation in any relevant Certified Industry Schemes) for implementing a staged approach to achievement the freshwater objectives In Table 3.11 -1."</u></p>



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Policy 6: Restricting land use change	PC1-11346	Support the provision with amendments	<p>AMEND Policy 6 to read:</p> <p><u>"a. Except as provided for in Policy 16...</u></p> <p><u>b. Land use change consent applications that demonstrate clear and enduring decreases in existing diffuse discharges or nitrogen, phosphorus, sediment or microbial pathogens how the freshwater objectives in Objective 3 and Table 3.11 -1 can be achieved will generally be granted.</u></p> <p><u>c. Sub-catchment land use change consent applications will generally be granted where:</u></p> <p><u>i. It is made by an enterprise for properties in a sub-catchment following a collaborative process to seek participation from all stakeholders with an interest in the land area in any sub-catchment.</u></p> <p><u>ii. It is supported by an adaptive management and mitigation approach for the sub-catchment which determines the suitability of the land for development including the risk of contaminant discharges from that land and the sensitivity of the receiving water bodies.</u></p> <p><u>iii. The enterprise has prepared a Sub-catchment Management Plan in accordance with the criteria set out in [new] Schedule 2 of Chapter 3.11 with actions which demonstrate how the enterprise will achieve Objective 3 and specifically the Table 3.11-1 freshwater objectives."</u></p>
Policy 7: Preparing for allocation in the future	PC1-11347	Support the provision with amendments	<p>AMEND Policy 7 to read:</p> <p><b>"Preparing for allocation in the future</b></p> <p><u>Through the Stage 1 period, engage with key stakeholders and resource users to determine a sub-catchment approach to actively manage Prepare for further diffuse discharge reductions and any future property or enterprise-level allocation of diffuse discharges for adoption into enterprise based sub-catchment management consents 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 support this engagement, Waikato Regional Council will collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools adaptive management and mitigation approaches (including Decision Support Tools) to estimate contaminant discharges, and researching the spatial variability of land use...that will assist in defining 'land suitability' for allocation.</u></p> <p>...</p> <p><u>d. Future allocation decisions should take advantage of new data and knowledge.</u></p> <p><u>d. Allow the flexibility for discharges to move between uses and increase incentives for efficient land use; and</u></p> <p><u>e. Apply an equitable base allocation in standardised amounts for discharges to land, that is a proportion of the available resource; and</u></p> <p><u>f. The ability to respond to changing environmental circumstances; and</u></p> <p><u>g. In accordance with Te Mana o Te Wai</u></p> <p><u>Encourage enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change - where an adaptive management and mitigation approach for the sub-catchment provides information and monitoring results that can define 'land suitability' consistent with the principles for allocation during the current plan period."</u></p>
Policy 8: Prioritised implementation	PC1-11348	Support the provision with amendments	<p>ADD the following paragraph to Policy 8: <u>"Providing for enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable</u></p>

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			<u>production, associated diffuse discharges, and land use change, in advance of the priority dates and events in Rule 3.11.5.4 and Table 3.11-2 will positively assist in achieving a tailored approach to sub-catchment mitigation and implementing Policies 2 and 9."</u>
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-11349	Support the provision with amendments	ADD the following paragraph to Policy 9: " <u>Encouraging enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change, will provide a key method (alongside participation in any relevant Certified Industry Schemes) for achieving clear and enduring improvements in water quality by implementing adaptive management and mitigation measures in accordance with Policy 6(c)."</u>
Policy 10: Provide for point source discharges of regional significance	PC1-11350	Support the provision with amendments	AMEND Policy 10 to read: "Policy 10: Provide for <u>diffuse or</u> point source discharges of regional significance... When deciding resource consent applications for <u>diffuse or</u> point source discharges... b. Continued operation <u>and development</u> of regionally significant industry <u>and primary production.</u> "
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-11351	Support the provision with amendments	AMEND Policy 11 to read: "Policy 11: Application of Best Practicable Option and mitigation or offset of effects to <u>diffuse or</u> point source discharges... Require any person undertaking a <u>diffuse or</u> point source discharge... an alternative location or locations to the <u>diffuse or</u> point source discharge... a. Primary discharge does not result in any significant <del>toxic</del> adverse effect <del>at the point source discharge location on the environment;</del> and"
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-11352	Support the provision with amendments	AMEND Policy 12 to read: "Policy 12: Additional considerations for <u>diffuse or</u> point source discharges in relation to water quality targets... Consider the contribution made by a <u>diffuse or</u> point source discharge to... a. The relative proportion of nitrogen, phosphorus, sediment or microbial pathogens that the particular <u>diffuse or</u> point source discharge contributes to the catchment load; and"
Policy 13: Point sources consent duration	PC1-11353	Support the provision with amendments	AMEND Policy 13 to read: "Policy 13: <u>Diffuse or p</u> Point sources consent duration..."
Policy 14: Lakes Freshwater Management Units	PC1-11354	Support the provision	RETAIN Policy 14 as notified or amended by similar wording to like effect.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-11355	Support the provision with amendments	AMEND Policy 16 to read: " <del>Best</del> <u>Adaptive Management and mitigation approaches for the sub-catchment are developed and implemented to support the</u> management practice actions for nitrogen, phosphorus, sediment and microbial pathogens for the proposed new type of land use; and..."
Policy 17: Considering the wider context of the Vision and Strategy	PC1-11356	Support the provision	RETAIN Policy 17 as notified or amended by similar wording to like effect.
3.11.4.1 Working with others	PC1-11357	Support the provision	RETAIN Method 3.11.4.1 as notified or amended by similar wording to like effect.
3.11.4.2 Certified Industry Scheme	PC1-11358	Oppose the provision	DELETE Method 3.11.4.2 and renumber the subsequent methods accordingly.
3.11.4.3 Farm Environment Plans	PC1-11359	Oppose the provision with amendments	AMEND Method 3.11.4.3 to read: " <del>Waikato Regional Council will prepare parameters and minimum requirements for the development of a certification process for professionals to develop, certify and monitor Farm Environment Plans in a consistent approach across the region.</del> A Farm Environment Plan will be prepared by a <u>certified</u> <del>an</del> <u>appropriately qualified or experienced</u> person as

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			per the requirements... in order to bring about reductions in the discharges of those contaminants. <del>Waikato Regional Council will develop guidance for risk assessments, auditing and compiling Farm Environment Plans.</del> ...(independent of the farmer and <del>Certified</del> Farm Environment Planner <u>Plan author</u> ) and monitoring will be required."
3.11.4.4 Lakes and Whangamarino Wetland	PC1-11360	Support the provision	RETAIN Method 3.11.4.4 as notified or amended by similar wording to like effect.
3.11.4.5 Sub-catchment scale planning	PC1-11361	Support the provision with amendments	ADD a NEW paragraph (b) to Method 3.11.4.5 to read: " <u>Resource consent applications should adopt an adaptive management and mitigation approach for the sub-catchment for modelling and measuring diffuse discharges from individual properties, enterprises and sub-catchments in relation to current and proposed land used, biophysical properties, and the climate and natural capacity of the landscape to attenuate contaminant losses.</u> " AND AMEND to renumber paragraphs (b)-(g) as (c)-(h) AND ADD a NEW paragraph (i) to read: " <u>In the interim, providing for enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change, in advance of the priority dates and events in Rule 3.11.5.4 and Table 3.11-2 will positively assist in achieving a tailored approach to sub-catchment mitigation and implementing Policies 2 and 9.</u> "
3.11.4.6 Funding and implementation	PC1-11363	Support the provision	RETAIN Method 3.11.4.6 as notified or amended by similar wording to like effect.
3.11.4.7 Information needs to support any future allocation	PC1-11364	Support the provision with amendments	AMEND Method 3.11.4.7 to read: " <u>3.11.4.7 Adopting an adaptive management and mitigation approach for sub-catchments for information needs to support any future allocation of diffuse discharges</u> Gather information and commission appropriate scientific research to inform <u>the development and implementation of any future a</u> framework for the allocation of diffuse discharges including: a. Implementing processes that will support the <u>development of an adaptive management and mitigation approach for the setting of property or enterprise-level diffuse discharge limits in the future</u> each sub-catchment."
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-11365	Support the provision with amendments	AMEND Method 3.11.4.8 to read: "a...knowledge and technology at the time; <del>and</del> <u>b. Monitor and review any adaptive management and mitigation approach for the sub-catchment developed to determine a discharge allocation regime for the relevant sub-catchment as part of Stage 1; and</u> <u>c.b.</u> Use this to inform..."
3.11.4.9 Managing the effects of urban development	PC1-11366	Support the provision	RETAIN Method 3.11.4.9 as notified or amended by similar wording to like effect.
3.11.4.10 Accounting system and monitoring	PC1-11367	Support the provision with amendments	AMEND Method 3.11.4.10(d) to read: "An information and accounting system for the diffuse discharges from properties and enterprises that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at an enterprise or property scale <u>or sub-catchment level.</u> "
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-11368	Support the provision with amendments	AMEND Method 3.11.4.11 to read: "b. Research and identify methods <u>including an adaptive management and mitigation planning approach developed for the relevant sub-catchment</u> to measure actions at a sub-catchment, property and enterprise level, and their contribution to

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			<p>reduction in the discharge of contaminants.</p> <p>...</p> <p>d. Collate data on the number of land use resource consents issued under the rules of this chapter, the number of Farm Environment Plans completed, compliance with the actions listed in Farm Environment Plans, Nitrogen Reference Points for properties and enterprises, <del>and</del> nitrogen discharge data reported under Farm Environment Plans, <u>and the actions for discharge allocation for the relevant sub-catchment.</u></p> <p>e. Work with industry to collate information on the functioning and success of any <del>Certified Industry Scheme</del> <u>adaptive management and mitigation approach developed by an enterprise.</u>"</p>
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-11369	Support the provision with amendments	<p>AMEND Method 3.11.4.12 to read: "3.11.4.12 Support research and dissemination of <u>best good</u> practice guidelines to reduce diffuse discharges...</p> <p>a. Develop and disseminate <u>best good</u> management practice guidelines for reducing the diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens; and..."</p>
3.11.5 Rules	PC1-11382	Support the provision	<p>ADD a NEW Rule 3.11.5.8 to read:</p> <p><u>"Rule 3.11.5.8 - Permitted Activity Rule - Transfer of Discharge Permits pertaining to the merger of properties or enterprises to form an enterprise or to the split or break-up of an enterprise in the same sub-catchment</u></p> <p><u>The transfer of part or all of any resource consent for farming activities or commercial vegetable production and the associated diffuse discharge of contaminants granted pursuant to Rules 3.11.5.4, 3.11.5.5 or 3.11.5.6 to another property or enterprise for another site is a permitted activity subject to the following conditions:</u></p> <p><u>1. The transfer does not worsen the actual or potential effect of any discharges on the environment; and</u></p> <p><u>2. The transfer does not result in any discharges that contravene a national environmental standard; and</u></p> <p><u>3. Both sites are in the same sub-catchment; and</u></p> <p><u>4. Written notice of the transfer is given to Waikato Regional Council; and</u></p> <p><u>5. A Farm Environment Plan or a sub-catchment management plan (as relevant) has been prepared in accordance with Schedule 1 or [new] Schedule 2 by the transferee."</u></p> <p>AND ADD a NEW Rule 3.11.5.9 to read:</p> <p><u>"Rule 3.11.5.9 - Controlled Activity Rule - Transfer of Discharge Permits pertaining to the merger of properties or enterprises to form an enterprise or to the split or break-up of an enterprise in the same Freshwater Management Unit</u></p> <p><u>The transfer of part or all of any resource consent for farming activities or commercial vegetable production and the associated diffuse discharge of contaminants granted pursuant to Rules 3.11.5.4, 3.11.5.5 or 3.11.5.6 to another property or enterprise for another site is a <b>controlled [activity]</b> subject to the following conditions:</u></p> <p><u>1. The transfer does not worsen the actual or potential effect of any discharges on the environment; and</u></p> <p><u>2. The transfer does not result in any discharges that contravene a national environmental standard; and</u></p> <p><u>3. Both sites are in the same Freshwater Management Unit as defined by this Plan; and</u></p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			4. Written notice of the transfer is given to Waikato Regional Council; and 5. A Farm Environment Plan or a Sub-catchment management plan (as relevant) has been prepared in accordance with Schedule 1 or [new] Schedule 2 by the transferee."
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-11370	Support the provision	RETAIN Rule 3.11.5.1 as notified or amended by similar wording to like effect.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-11371	Support the provision	RETAIN Rule 3.11.5.2 as notified or amended by similar wording to like effect.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-11372	Oppose the provision	DELETE Rule 3.11.5.3 or prepare a variation or plan change to incorporate any Certified Industry Scheme in to the Waikato Regional Plan by reference AND MAKE consequential amendments to PPC1 to insert the words " <u>any relevant</u> " before any reference to 'Certified Industry Scheme/s'.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-11374	Support the provision with amendments	AMEND Rule 3.11.5.4 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 commercial vegetable production) where the land is not registered to a <u>relevant</u> Certified Industry Scheme... is a permitted activity until <u>the point in time or event (whichever occurs first) specified below:</u> <u>1. Resource consent is granted to an enterprise for sub-catchment land use change and farming activities and associated diffuse discharges in conformance with Policy 6(c);</u> " AND AMEND to renumber the subsequent points accordingly.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-11377	Support the provision with amendments	AMEND Rule 3.11.5.5 to be consistent with the amendments made by the submission to the rules regarding farming activities.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-11378	Support the provision with amendments	AMEND Rule 3.11.5.6 to read: "Rule 3.11.5.6 Restricted Discretionary activity rule - the use of land for farming activities <u>A. The use of land by an enterprise for sub-catchment farming activities and the associated diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a <b>restricted discretionary activity</b> (requiring resource consent) subject to the following requirements:</u> <u>A Sub-catchment management plan (prepared in accordance with [new] Schedule 2) is to be provided to the Waikato Regional Council at the time when the resource consent application is lodged.</u> <u>Waikato Regional Council restricts its discretion under Rule 3.11.5.6.A over the following matters:</u> <u>i. Conformance with Policy 6(c);</u> <u>ii. Cumulative effects on water quality in the relevant sub-catchment(s);</u> <u>iii. The content of the <b>Sub-catchment management plan</b> prepared for the relevant sub-catchment by the relevant enterprise in accordance with the requirements of [new] <b>Schedule 2</b>;</u> <u>iv. The need for and content of a Farm Environmental Plan;</u> <u>v. The adoption of an adaptive management and mitigation approach to manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens;</u> <u>vi. The term of the resource consent having regard to Policy 13;</u>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>vii. <u>The timeframe and circumstances under which the consent conditions may be reviewed.</u></p> <p><u>B. The use of land for farming activities that does not comply with the conditions, standards or terms of Rules 3.11.5.1 to 3.11.5.5 ...</u></p> <p>Waikato Regional Council restricts its discretion <u>under Rule 3.11.5.6.B</u> over the following matters:  ...iv. <u>The term of the resource consent having regard to Policy 13...</u></p> <p><u>C. 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 3.11.5.6.A or 3.11.5.6.B is a discretionary activity (requiring resource consent) subject to the following requirements:</u></p> <p><u>A Sub-catchment management plan (prepared in accordance with [new] Schedule 2) is to be provided to the Waikato Regional Council at the time when the resource consent application is lodged.</u></p> <p>Notification:  Consent applications <u>under Rules 3.11.5.6.A, 3.11.5.6.B, and 3.11.5.6.C</u> will be considered without notification, and without the need to obtain written approval of affected persons.</p> <p><u>Advisory note:</u>  <u>The assessment of any applications under these rules shall take into account the matters identified in Policies 6(b) and 10-13 of Section 3.11.3."</u></p>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-11379	Support the provision with amendments	<p>AMEND Rule 3.11.5.7 to read:</p> <p><u>"A. Any of the following sub-catchment changes in the use of land by an enterprise from that which was occurring at 22 October 2016 within the subject land area:</u></p> <ol style="list-style-type: none"> <li><u>1. Woody vegetation to farming activities; or</u></li> <li><u>2. Any livestock grazing other than dairy farming to dairy farming; or</u></li> <li><u>3. Arable cropping to dairy farming</u></li> </ol> <p><u>is a restricted discretionary activity (requiring resource consent) subject to the following requirements:</u></p> <p><u>A sub-catchment management plan (prepared in accordance with [new] Schedule 2) is to be provided to the Waikato Regional Council at the time when the resource consent application is lodged.</u></p> <p><u>Waikato Regional Council restricts its discretion over the following matters:</u></p> <ol style="list-style-type: none"> <li><u>i. Conformance with Policy 6(c);</u></li> <li><u>ii. The content of the sub-catchment management plan prepared for the sub-catchment by the relevant enterprise in accordance with the requirements of [ new] Schedule 2;</u></li> <li><u>iii. The need for and content of a Farm Environmental Plan;</u></li> <li><u>iv. The adoption of an adaptive management and mitigation approach to manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens;</u></li> <li><u>v. The term of the resource consent having regard to Policy 13;</u></li> <li><u>vi. The timeframe and circumstances under which the consent conditions may be reviewed.</u></li> </ol> <p><u>B. Any changes in the use of land that enables the development of tangata whenua ancestral lands in conformity with Policies 6(a) and 16 is a restricted discretionary activity/discretionary activity (requiring resource consent).</u></p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>C. Any sub-catchment changes in the use of land by an enterprise from that which was occurring at <u>22 October 2016</u> within the subject land area that does not conform with the matters in Rule <u>3.11.5.7.A</u>, where prior to <u>1 July 2026</u> the change exceeds a total of 20 hectares, is a <b>discretionary activity</b> (requiring resource consent) subject to the following requirements:  <u>A Sub-catchment management plan (prepared in accordance with [new] Schedule 2) is to be provided to the Waikato Regional Council at the time when the resource consent application is lodged.</u>  <b>Notification</b>  <u>Consent applications under Rules 3.11.5.7.A, 3.11.5.7.B, and 3.11.5.7.C will be considered without notification, and without the need to obtain written approval of affected persons.</u>  <u>D. Notwithstanding any other rule in this Plan, Except as provided for in Rules 3.11.5.7.A, 3.11.5.7.B and 3.11.5.7.C 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:..."</u></p>
Schedule A - Registration with Waikato Regional Council	PC1-11383	Support the provision	RETAIN Schedule A as notified or amended by similar wording to like effect.
Schedule B - Nitrogen Reference Point	PC1-11384	Support the provision with amendments	<p>AMEND Schedule B(c) to read: "The Nitrogen Reference Point must be calculated using <u>either</u> the current version of the OVERSEER <u>or</u> the APSIM <u>or</u> the SPASMO model <del>(or any other model approved by the Chief Executive of the Waikato Regional Council).</del>"  AND AMEND Schedule B(d) to read: "The Nitrogen Reference Point data shall comprise the electronic output file from <u>either</u> the OVERSEER <u>or</u> the APSIM <u>or</u> the SPASMO Model <del>or other approved model</del>, 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."  AND AMEND Schedule B(f) to read: "There reference period is the two financial years covering 2014/2015 and 2015/2016 <u>(including any currently planned or consented future land use)</u>, except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016."</p>
Schedule C - Stock exclusion	PC1-11388	Support the provision	RETAIN Schedule C as notified or amended by similar wording to like effect.
Schedule 1 - Requirements for Farm Environment Plans	PC1-11389	Support the provision with amendments	<p>AMEND Schedule 1(2)(e) to read: "A description of nutrient management practices including a nutrient budget for the farm enterprise calculated using <u>either</u> the <del>model</del> <u>current version of the</u> OVERSEER <u>or</u> the APSIM <u>or</u> the SPASMO Model in accordance with the <del>OVERSEER</del> <u>relevant use protocols, or using any other model or method approved by the Chief Executive Officer of Waikato Regional Council.</u>"  AND AMEND Schedule 1(5)(a) to read: "Actions, timeframes and other measures...as determined by the use of <u>either</u> the current version of <u>the</u> OVERSEER <u>or</u> the APSIM <u>or</u> the SPASMO Model, does not increase beyond the property or enterprise's Nitrogen Reference Point <u>(as calculated in accordance with paragraph (f) of Schedule B)</u>, unless other suitable mitigations are specified; or"</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12546	Support the provision with amendments	<p>AMEND Schedule 1 to consistently refer to a 'property or enterprise' throughout  AND AMEND all references to 'Certified Industry Schemes' to read "<u>any relevant</u> Certified Industry Scheme".</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule 1 - Requirements for Farm Environment Plans	PC1-12547	Support the provision with amendments	ADD a NEW Schedule 1(6) to read: " <u>Farm Environment Plans will be subject to review within the period of 6 months following the preparation of any relevant Sub-catchment management plan pertaining to a property or enterprise to ensure that Farm Environment Plans are not inconsistent with relevant Sub-catchment management plans.</u> "
Schedule 2 - Certification of Industry Schemes	PC1-11390	Oppose the provision	DELETE Schedule 2.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-11391	Oppose the provision with amendments	AMEND PPC1 to use consistent cross-referencing to the freshwater objectives in the National Policy Statement for Freshwater 2014. AND AMEND Table 3.11-1 to include a new first column which identifies and links the sub-catchment name with the relevant sub-catchment number as shown in Appendix C of the submission. AND AMEND to substitute the short-term and long-term numerical freshwater objectives for sub-catchments 56, 58, 59, 62, 65, 66B, 72, 73 and 74 with the alternative freshwater objectives in Appendix C of the submission. AND AMEND to insert an additional row to provide freshwater objectives for sub-catchment 66A (Tahorakuri) as shown in Appendix C of the submission.
Table 3.11-2: List of sub-catchments showing Priority 1, Priority 2, and Priority 3 sub-catchments	PC1-11395	Support the provision with amendments	DELETE from Table 3.11-2 the row pertaining to sub-catchment 66 AND ADD two new rows to list sub-catchments 66A (Tahorakuri) and 66B (Ohakuri) as priority 3 sub-catchments.
Map 3.11-2: Map of the Waikato and Waipa River catchments, showing sub-catchments	PC1-11396	Support the provision with amendments	AMEND Map 3.11-2 to show the subdivision of sub-catchments 66 into sub-catchments 66A (Tahorakuri) and 66B (Ohakuri), as shown in Appendix D of the submission) and coloured appropriately to reflect their priority level.
5.1.5 Conditions for Permitted Activity Rule 5.1.4.11 and Standards and Terms for Controlled Activity Rules	PC1-11397	Support the provision	Permitted Activity Rule 5.1.4.11 in section 5.1.5 - RETAIN Consequential amendments to the Waikato Regional Plan as notified or amend by similar wording to like effect.
Additions to Glossary of Terms	PC1-11400	Support the provision with amendments	ADD a NEW definition for 'adaptive management' to read: " <u>Adaptive management means the approach to avoiding, remedying or mitigating any actual or potential adverse effects on the environment that addresses risk or uncertainty arising from consented sub-catchment-wide land use change and farming activities and associated contaminant discharges carried out by an enterprise as detailed in Schedule 3, namely:</u> a) <u>The need for good baseline information about the receiving environment;</u> b) <u>Whether consent conditions provide for effective monitoring of adverse effects using appropriate indicators;</u> c) <u>That thresholds are set to trigger remedial action before the effects become overly damaging;</u> <u>and</u> d) <u>That any effects that might arise can be remedied before they become irreversible.</u> " AND ADD a NEW definition for 'Decision Support Tool' to read: " <u>Decision Support Tool means an information and accounting framework that can be used to assist with analysis and decision making processes within an enterprise (or property) that supports the management of diffuse discharges from properties of nitrogen, phosphorus, sediment and microbial pathogens at a sub-catchment scale.</u> "



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND ADD a NEW definition for 'mitigation measures' to read: "<u>Mitigation measures means the measures (as detailed in Schedule 4) to be undertaken by an enterprise to ensure that the actual effects of carrying out sub-catchment-wide land use change and farming activities and associated contaminant discharges are within the scope of the AEE that accompanied the original resource consent application.</u>"</p> <p>AND ADD a NEW definition for 'sub-catchment management plan' to read: "<u>Sub-catchment management plan means a plan for the relevant part of a PPC1 sub-catchment (Map 3.11-2) prepared following a collaborative process involving iwi and other stakeholders, that identifies water quality issues and principles and management actions (including Decision Support Tools) required to manage these issues.</u>"</p> <p>AND AMEND the definition for 'point source discharges' to read: "<b>Point-source discharge:</b> For the purposes of Chapters 3.5 and 3.11, means <u>discharges associated with farming land use, and</u> discharges from a stationary or fixed facility, including the irrigation onto land from consented industrial and municipal wastewater systems."</p> <p>AND ADD 3 NEW schedules (as set out in Appendix B of the submission) to give effect to the above definitions.</p>
Definition - Point source discharge	PC1-13141	Support the provision with amendments	AMEND the definition for 'point source discharges' to read: " <b>Point-source discharge:</b> For the purposes of Chapters 3.5 and 3.11, means <u>discharges associated with farming land use, and</u> discharges from a stationary or fixed facility, including the irrigation onto land from consented industrial and municipal wastewater systems."
Consequential amendments to Waikato Regional Plan	PC1-11402	Support the provision	RETAIN Consequential amendments to the Waikato Regional Plan as notified or amend by similar wording to like effect.

## Wairarapa Moana Incorporation

Submitter ID: 72480

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-2191	Support the provision	<p>PUT PPC1 ON HOLD until Hauraki Iwi Authorities have been consulted and the withdrawn area is included again</p> <p>AND RETAIN Policy 15.</p>
3.11 Waikato and Waipa River Catchments	PC1-2073	Oppose the provision with amendments	REPLACE 'land suitability' references with 'new allocation or management regime to be determined by a full Schedule 1 Resource Management Act process before the next stage of Healthy Rivers Wai Ora [PPC1] is implemented'.
Map 3.11-1: Map of the Waikato and Waipa River catchments, showing Freshwater Management Units	PC1-2065	Oppose the provision with amendments	REPLACE Map 3.11-1 with a new sub-catchment map.
Objective 1: Long-term restoration and protection of water quality for	PC1-2076	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)

Plan Section	Submission Point ID	Support or Oppose	Decision requested
each sub-catchment and Freshwater Management Unit			
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-2078	Support the provision	RETAIN Objective 2.
Objective 3: 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	PC1-2079	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.
Objective 4: People and community resilience	PC1-2081	Support the provision	RETAIN Objective 4.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-2082	Support the provision	RETAIN Objective 5.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-2084	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> "
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-2087	Support the provision with amendments	AMEND Policy 2(d) to read as follows: "Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the <u>difference between current practices and the application of Best Management Practices (those not currently applying mitigations</u> are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment; and"
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-2102	Support the provision with amendments	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> " 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> "
Policy 5: Staged approach	PC1-2106	Support the provision with amendments	AMEND Policy 5 to read as follows: " <u>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 economic hardship and social disruption...</u> "
Policy 6: Restricting land use change	PC1-2111	Support the provision	RETAIN Policy 6.
Policy 7: Preparing for allocation in the future	PC1-2112	Oppose the provision with amendments	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</u> social disruption and costs in the transition..."
Policy 8: Prioritised implementation	PC1-2113	Oppose the provision with amendments	AMEND Policy 8 to replace prioritisation with the requirement that all farms submit and adhere to a Farm Environment Plan by 1st July 2020.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND DELETE reference to the 75th percentile nitrogen leaching value. AND AMEND sub-catchments to be defined by physical attributes.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-2115	Support the provision with amendments	ADD to Policy 9 a provision 'e' to read as follows: " <u>Providing Best Practice Management guidelines and examples of cost effective mitigations that have the biggest effect on improving water quality across a range of farming policies, land types and other biophysical factors, to be included in Farm Environment Plans and applied on properties and enterprises in the region.</u> "
Policy 10: Provide for point source discharges of regional significance	PC1-2117	Support the provision	RETAIN Policy 10.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-2118	Support the provision	RETAIN Policy 11.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-2119	Support the provision	RETAIN Policy 12.
Policy 13: Point sources consent duration	PC1-2120	Support the provision	RETAIN Policy 13.
Policy 14: Lakes Freshwater Management Units	PC1-2121	Support the provision	RETAIN Policy 14.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-2122	Support the provision with amendments	DELETE clauses ii and iii from Policy 16.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-2124	Support the provision	RETAIN Policy 17.
3.11.4.3 Farm Environment Plans	PC1-2125	Support the provision	AMEND Method 3.11.4.3 to provide Best Practice Management Guidelines and mitigations that apply to a range of farming practices, land types and other biophysical factors so that they can be included in Farm Environment Plans and applied across all properties and enterprises within the region.
3.11.4.7 Information needs to support any future allocation	PC1-2126	Oppose the provision with amendments	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> "
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-2137	Support the provision	RETAIN Method 3.11.4.12.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-2138	Support the provision	RETAIN Rule 3.11.5.1 as proposed.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-2140	Support the provision	RETAIN Rule 3.11.5.2 as proposed.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-2141	Oppose the provision with amendments	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.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-2142	Oppose the provision with amendments	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.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-2143	Support the provision	RETAIN Rule 3.11.5.6 as proposed.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-2144	Support the provision	RETAIN Rule 3.11.5.7 as proposed.
Schedule A - Registration with Waikato Regional Council	PC1-2145	Support the provision	RETAIN Schedule A as proposed.
Schedule B - Nitrogen Reference Point	PC1-2146	Oppose the provision with amendments	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.
Schedule C - Stock exclusion	PC1-2147	Support the provision	RETAIN Schedule C.
Schedule 1 - Requirements for Farm Environment Plans	PC1-2148	Support the provision with amendments	DELETE reference to the 75th percentile nitrogen leaching value. AND DELETE reference to land capability from Schedule 1(2)(d).
Schedule 1 - Requirements for Farm Environment Plans	PC1-12548	Support the provision with amendments	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.
Schedule 2 - Certification of Industry Schemes	PC1-2154	Support the provision with amendments	AMEND to ensure Waikato Regional Council have a robust audit system for on-going quality control of schemes.
3.11.6 List of Tables and Maps	PC1-2155	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.
Map 3.11-2: Map of the Waikato and Waipa River catchments, showing sub-catchments	PC1-2071	Oppose the provision with amendments	AMEND Map 3.11-2 so that FMU's are based on sub-catchments that are grouped according to their physical attributes.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
5.1.5 Conditions for Permitted Activity Rule 5.1.4.11 and Standards and Terms for Controlled Activity Rules	PC1-2156	Support the provision	RETAIN Rule 5.1.4.11.
Additions to Glossary of Terms	PC1-2159	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 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.
Definition - 75th percentile nitrogen leaching value	PC1-2158	Oppose the provision	DELETE Definition - 75th Percentile Nitrogen leaching value.

## Wai Shing Ltd

Submitter ID: 73069

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Area covered by Chapter 3.11	PC1-2222	Oppose the provision	WITHDRAW PPC1 until negotiations have concluded with Hauraki iwi AND RE-NOTIFY PPC1 after the consultation as a single plan.
Background and explanation	PC1-2229	Oppose the provision	AMEND Section 3.11 Background and explanation to provide some opportunity for commercial vegetable production on new sites in the Waikato River catchment AND AMEND Section 3.11 Background and explanation by adding an explicit statement to recognise permanent fruit production as a low intensity farming activity AND AMEND to provide an alternative method or model to establish a benchmark nitrogen and phosphorus discharge for commercial vegetable production systems AND AMEND to recognise permanent fruit production as a low intensity farming activity.
3.11.1 Values and uses for the Waikato and Waipa Rivers	PC1-2231	Support the provision	RETAIN in 3.11.1 Primary Production as a Mana Tangata value.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-2232	Support the provision	RETAIN Objective 2 as proposed.
Objective 3: 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	PC1-2233	Support the provision with amendments	AMEND Objective 3 to provide flexibility to land managers seeking to achieve reductions collaboratively at a catchment or sub-catchment scale.
Objective 4: People and community resilience	PC1-2253	Support the provision with amendments	AMEND Objective 4 to recognise that PPC1 is transitional.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to provide time to develop the tools required to more efficiently allocate responsibility for achieving contaminant reduction targets in the long-term.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-2254	Support the provision	RETAIN Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-2255	Support the provision with amendments	AMEND Policy 2 to provide alternatives to the Nitrogen Reference Point during the transitional period given the limitations of the OVERSEER Model for modelling horticultural systems.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12957	Support the provision with amendments	AMEND Policy 2 to enable a consenting pathway for groups that form to take responsibility for contaminant reductions by implementing a combination of catchment and paddock scale mitigations that are able to be measured and reported AND AMEND Policy 2 to provide flexibility to land managers seeking to achieve reductions collaboratively at a catchment or sub-catchment scale.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-2257	Support the provision with amendments	RETAIN Policy 3 subject to consequential amendments to other policies and methods to give effect to relief sought.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-2265	Support the provision	RETAIN Policy 4.
Policy 5: Staged approach	PC1-2266	Support the provision	RETAIN staged approach in Policy 5.
Policy 6: Restricting land use change	PC1-2268	Oppose the provision	AMEND Policy 6/PPC1 to provide for a restricted discretionary activity for operations capable of demonstrating clear and enduring decreases in existing diffuse discharges.
Policy 7: Preparing for allocation in the future	PC1-2270	Support the provision with amendments	AMEND the principles in Policy 7 to allow for a polluter pays concept.
Policy 8: Prioritised implementation	PC1-2272	Support the provision with amendments	RETAIN policy 8. AND ADD an enabling policy to allow management of horticultural enterprises between sub-catchments.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-2274	Oppose the provision	AMEND Policy 9 to provide for off-setting where it can be demonstrated there will be a commensurate effect on the restoration of the health and well-being of the Waikato River. AND AMEND Policy 9 to provide flexibility to land managers seeking to achieve reductions collaboratively at a catchment or sub-catchment scale.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-2287	Support the provision with amendments	AMEND Policy 11 so that offsetting of effects can occur for point source and diffuse source discharges
3.11.5 Rules	PC1-2292	Support the provision	ADD a NEW Restricted Discretionary Rule to enable contaminant management by a catchment collective.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-2263	Support the provision	RETAIN Rule 3.11.5.1.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-2291	Support the provision	RETAIN Rule 3.11.5.5 AND ADD provisions to enable crop rotation across new and existing land parcels AND AMEND to provide an alternative method or model to establish a benchmark nitrogen and phosphorus discharge for commercial vegetable production systems.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-2293	Oppose the provision	DELETE Rule 3.11.5.7 AND ADD a restricted discretionary rule that enables the use of land for new and additional commercial vegetable production where the effects of the land use change can demonstrate that there will be a decrease in the discharges.

## Wait, Bevan

Submitter ID: 71037

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-41	Support the provision	RETAIN the entire PPC1.

## Waitaka Farming Partnership

Submitter ID: 73441

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6438	Not stated	Ensure a cost analysis of PPC1 is available, in line with section 32 of the Resource Management Act.
3.11.4.3 Farm Environment Plans	PC1-6416	Oppose the provision	AMEND Method 3.11.4.3 to allow more flexibility in Farm Environment Plans AND AMEND to recognise in PPC1 that flexibility will allow farmers to change to meet demands AND AMEND to recognise in PPC1 that farming is the backbone of New Zealand's economy.
Schedule B - Nitrogen Reference Point	PC1-6411	Oppose the provision	Reconsider the use of the OVERSEER Model in PPC1 AND AMEND Schedule B and the time-frame for calculating the Nitrogen Reference Point by making it longer AND REPLACE grandparenting approach in PPC1 with a more equitable approach.
Schedule C - Stock exclusion	PC1-6413	Oppose the provision	AMEND Schedule C so rivers are categorised according to flow, volume, speed and river bed material and fenced accordingly or not at all. AND AMEND Schedule C so land above 25 degrees (in most cases) is not required to be fenced but water troughs are provided.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule 1 - Requirements for Farm Environment Plans	PC1-6415	Oppose the provision	AMEND to recognise in PPC1 that flexibility will allow farmers to change to meet demands AND AMEND to recognise in PPC1 that farming is the backbone of New Zealand's economy.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12549	Oppose the provision	AMEND Schedule 1 to allow more flexibility in Farm Environment Plans.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12550	Oppose the provision	AMEND Schedule 1 so that for land greater than 25 degrees in slope consideration is taken that the land is protected with reasonable cover (dry matter) to reduce sediment runoff.

## Waitomo Catchment Trust Board

Submitter ID: 73124

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 3: 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	PC1-7952	Support the provision with amendments	AMEND PPC1 to ensure that all discharges to contact recreation streams are considered as point source discharges [inputs] and monitored as such on a case-by-case basis. AND AMEND PPC1 to ensure that grazing adjacent to waterways and on steep contour is at least a controlled activity and where necessary a restricted discretionary activity. AND AMEND PPC1 to promote edge of field mitigation on farms bordering contact recreation streams. AND AMEND PPC1 to ensure that robust, regular monitoring is mandatory where consented activities take place.
Policy 6: Restricting land use change	PC1-7950	Oppose the provision	DELETE Policy 6 AND AMEND to provide for land use change in Farm Environment Plans AND AMEND to ensure that low dischargers can increase production to offset rising costs AND AMEND to ensure that properties where mitigation is already in place are taken into account when applying for resource consent.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-7954	Not stated	No specific decision sought for Rule 3.11.5.2(4)(e)ii.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-7953	Support the provision with amendments	AMEND PPC1 to ensure that all discharges to contact recreation streams are considered as point source discharges [inputs] and monitored as such on a case-by-case basis. AND AMEND PPC1 so that grazing adjacent to waterways and on steep contour is at least a controlled activity, and a restricted discretionary activity where necessary. AND AMEND PPC1 to promote edge of field mitigation on farms bordering contact recreation streams. AND AMEND PPC1 to ensure that robust, regular monitoring is mandatory where consented activities take place.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-7951	Oppose the provision	DELETE Rule 3.11.5.7 and provide for land use change in Farm Environment Plans AND AMEND to ensure that low dischargers can increase production to offset rising costs AND AMEND to ensure that properties where mitigation is already in place are taken into account when applying for resource consent.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-7947	Support the provision with amendments	AMEND Schedule B so that Nitrogen Reference Points are calculated on a 5-year reference period, at a property or sub-catchment level, as part of the Farm Environment Plan. AND AMEND to ensure the highest dischargers are required to reduce to the 60th percentile, and very low historical dischargers may increase to the 30th percentile. AND AMEND to ensure that landowners that have previously worked to reduce their discharges have this taken into account when calculating the Nitrogen Reference Point.
Schedule C - Stock exclusion	PC1-7949	Support the provision with amendments	AMEND Schedule C to prioritise stock exclusion from the waterways, wetlands and lakes known to Waikato Regional Council, in a staged manner focussing on the larger and/or most polluted waterways first. AND CLARIFY further the definition of waterways. AND AMEND to provide funding and subsidies for all new riparian and erosion prone fencing, maintenance and alternative water systems.
Schedule 1 - Requirements for Farm Environment Plans	PC1-7943	Support the provision with amendments	AMEND Schedule 1 so that Nitrogen Reference Points are calculated as part of the Farm Environment Plan, at a property or sub-catchment level. AND if the Nitrogen Reference Point is to be calculated as a percentile, it should be based on a 5-year average.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12551	Support the provision with amendments	AMEND Schedule 1 to ensure collaboration between Waikato Regional Council and landowners in developing Farm Environment Plans, and that Farm Environment Plans are a free or subsidised service.

## Waitomo District Council

Submitter ID: 73688

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-10298	Support the provision with amendments	Make in relation to all of the topics in PPC1, any consequential and/or similar amendments to have the same effect AND CONSIDER Waitomo District Council's offer to work with Waikato Regional Council staff and other submitters to develop specific wording within the scope of those requests AND inform key stakeholders of progress and proposals for the withdrawn section of PPC1 AND develop an implementation plan that spreads costs of achieving water quality improvements more widely across the region (rather than 'user pays' approach) AND resource the development of sub-catchment management plans through funding and staff to focus effort in the areas where the benefits are greatest AND AMEND to employ robust sub-catchment planning and management and place more emphasis on Farm Environment Plans to manage nitrogen.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-10313	Support the provision	RETAIN Objective 1.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-10314	Support the provision	RETAIN Objective 2.
Objective 3: 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	PC1-10315	Support the provision with amendments	AMEND Objective 3 to read: "Short term Improvements to water ( <u>ie. By 2026</u> )..."
3.11.3 Policies	PC1-11105	Support the provision with amendments	AMEND Policies nitrogen 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 Plans AND REMOVE the use of modelled (OVERSEER Model) numerical values of nitrogen discharges to determine resource consent status and compliance with standards AND AMEND to 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 CLARIFY how phosphorus is being measured in the Waipā Freshwater Management Unit AND AMEND to consider in setting stock exclusion requirements the total E.coli reduction that can actually be achieved by fencing drystock farms waterways compared to the total cost of undertaking the fencing.
Policy 6: Restricting land use change	PC1-10317	Oppose the provision	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].
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-10323	Oppose the provision with amendments	AMEND Policy 9 and Method 3.11.4.5 to make the development of sub-catchment plans a high priority implementation item OR ADD a NEW sub-catchment management policy to make the development of sub-catchment plans a high priority implementation item AND AMEND to focus sub-catchment plan development and implementation on Priority 1 sub-catchments first. AND AMEND to include working closely with territorial authorities in the development of sub-catchment plans AND AMEND to promote sub-catchment plans that deliver broader benefits than individual property compliance.
Policy 10: Provide for point source discharges of regional significance	PC1-10318	Support the provision	RETAIN Policy 10. AND AMEND the Policies 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].

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-10319	Support the provision	RETAIN Policy 11. AND AMEND the Policies 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].
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-10320	Support the provision	RETAIN Policy 12. AND AMEND the Policies 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].
Policy 13: Point sources consent duration	PC1-10321	Support the provision	RETAIN Policy 13.
3.11.4.5 Sub-catchment scale planning	PC1-10322	Oppose the provision with amendments	AMEND Method 3.11.4.5 and Policy 9 to make the development of sub-catchment plans a high priority implementation item OR ADD a NEW sub-catchment management policy to make the development of sub-catchment plans a high priority implementation item AND AMEND to focus sub-catchment plan development and implementation on Priority 1 sub-catchments first AND AMEND to include working closely with territorial authorities in the development of sub-catchment plans AND AMEND to promote sub-catchment plans that deliver broader benefits than individual property compliance.
3.11.4.6 Funding and implementation	PC1-10324	Oppose the provision with amendments	ADD to Method 3.11.4.6 the following clauses to read: " <u>...c. Provide sufficient staff and financial resources to work with local authorities within the catchments to ensure consistent and coordinated information and implementation is available to landowners and that community engagement is undertaken to ensure the purposes are well understood by the community.</u> <u>d. Investigate methods of providing PPC1 information on LIM reports.</u> <u>e. Work with local authorities and stakeholders within the catchments to prioritise, develop and implement sub-catchment plans.</u> "
3.11.5 Rules	PC1-10312	Oppose the provision with amendments	AMEND the Rules provisions to provide certainty for PPC1 users and for Council staff administering the provisions AND AMEND to ensure the provisions are clear, can be implemented and are enforceable AND AMEND the dates required for property registration, preparation of Farm Environment Plans and calculation of Nitrogen Reference Points to allow a reasonable amount of time following PPC1 becoming operative. AND AMEND the provisions 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.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-10326	Oppose the provision with amendments	AMEND Rule 3.11.5.1 to clarify how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-10328	Oppose the provision with amendments	AMEND Rule 3.11.5.2 to clarify how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			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 Plan to inform mitigation measures.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-10330	Oppose the provision with amendments	AMEND Rule 3.11.5.3 to clarify how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance. 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.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-10332	Oppose the provision with amendments	AMEND Rule 3.11.5.4 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 3.11.5.4 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.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-10333	Oppose the provision with amendments	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.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-10334	Oppose the provision with amendments	AMEND Rule 3.11.5.6 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.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13125	Oppose the provision with amendments	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.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-10335	Oppose the provision with amendments	AMEND Rule 3.11.5.7 to clarify how changes in property boundaries and lease arrangements with properties and enterprises will affect compliance

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<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</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>
Schedule A - Registration with Waikato Regional Council	PC1-10337	Support the provision with amendments	<p>DELETE Schedule A (3)</p> <p>AND AMEND Schedule A 5(b) to read: "<u>Legal descriptions of the property as per the and certificate(s) of title (computer freehold registers) for all of the land in the property</u>"</p> <p>AND ADD Schedule A after 5(f): "<u>(g) If the property forms part of an enterprise provide the name of that enterprise</u>".</p>
Schedule B - Nitrogen Reference Point	PC1-10341	Oppose the provision with amendments	<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 Plans.</p> <p>AND REMOVE the use of modelled (the OVERSEER Model) numerical values of nitrogen discharges to determine resource consent status and compliance with standards</p> <p>AND CONSIDER the risks cost and benefits of Overseer in more detail</p> <p>AND AMEND to replace the nitrogen management provisions with an emphasis on Farm Environment Plans and robust sub-catchment planning and management.</p> <p>AND CLARIFY how Phosphorus is being measured in the Waipā Freshwater Management Unit.</p>
Schedule C - Stock exclusion	PC1-10846	Oppose the provision	<p>DELETE Schedule C</p> <p>AND REPLACE it with cross references to the proposed national stock exclusion regulations being produced by the Ministry for the Environment</p> <p>AND MAKE any necessary consequential amendments to the rules.</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-10856	Oppose the provision with amendments	<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>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12552	Oppose the provision with amendments	<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>
3.11.6 List of Tables and Maps	PC1-10859	Support the provision with amendments	<p>AMEND Table 3.11-1 to ensure appropriate account has been taken in setting the E.coli limits to make allowance for peak flooding events.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-10848	Support the provision with amendments	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.
Definition - Certified Farm Nutrient Advisor	PC1-10851	Oppose the provision	Rationalise the definitions of 'Certified Farm Nutrient Advisor' and 'Certified Nutrient Management Advisor' in the Regional Plan and PPC1 so they are the same.
Definition - Farming activities	PC1-10853	Oppose the provision	AMEND the glossary of terms to rationalise the definitions of 'Farming Activities' in PPC1 and the Waikato Regional Plan so they are the same.

## Walker, Brett

Submitter ID: 74199

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6778	Oppose the provision	No specific decision sought for PPC1.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-6783	Oppose the provision	No specific decision requested for Objective 5.

## Walker, Patience Anne LeSuer

Submitter ID: 73458

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-9948	Support the provision with amendments	AMEND Rule 3.11.5.2(4)(e)(i) to reduce the cultivation setback for peat soils AND AMEND to ensure that standoff is specific to soil type and gradient.
Schedule 1 - Requirements for Farm Environment Plans	PC1-9954	Support the provision with amendments	AMEND Schedule 1(2)(b)(iii) to reduce the cultivation setback on peat soils AND AMEND to ensure standoff is specific to soil type and gradient.

# Walker, Richard

Submitter ID: 73919

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-12326	Not stated	WITHDRAW PPC1 and allow the farming community 2.5 years to develop a workable alternative AND IMPOSE a 10 year moratorium on members of the Technical Leaders Group to prevent them from taking advantage of any business opportunities deriving from PPC1 AND ALIGN with the National Policy Statement on Freshwater Management AND REINSTATE Objective 6 as originally proposed AND REINSTATE Policy 15 and AMEND to be holistic and include all sources influencing the health and well-being of the Waikato River and its catchments especially pest fish species, in relation to sub-catchment management AND make any consequential amendments including to the objectives, policies and rules or restructuring to give effect to the relief sought.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-6715	Support the provision with amendments	RETAIN Objective 1 long-term restoration and protection of water quality for the Waikato and Waipā rivers AND AMEND PPC1 to be holistic and include all sources influencing the health and well-being of the Waikato River and its catchments AND DELETE flood/high flow conditions from water quality target data (Table 3.11.1) AND AMEND to address contaminants on a sub-catchment basis, to enable targeting of the highest discharging sub-catchments.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-6716	Support the provision with amendments	RETAIN Objective 2 the maintenance of long-term social, economic and cultural well-being in the Waikato and Waipā catchment communities AND WITHDRAW PPC1 until the north eastern portion [Hauraki Iwi area] and the WRA's Vision and Strategy has been amended AND ENSURE a Section 32 analysis is conducted to investigate the revised impact PPC1 could have on society and economy AND AMEND Rules to remove the Nitrogen Reference Point to align with intention of Objective 2 AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored Farm Environment Plan to align with the intention of Objective 2 AND AMEND to address contaminants on a sub-catchment basis, to enable targeting of the highest discharging sub-catchments to align with the intention of Objective 2 AND AMEND to develop robust indicators to measure social, economic and cultural well-being.
Objective 3: 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	PC1-6717	Support the provision with amendments	RETAIN the Objective 3 10 per cent achievement of the PPC1 long-term water quality targets by 2026 AND AMEND PPC1 Rules to remove the Nitrogen Reference Point AND AMEND to adopt a sub-catchment approach to ensure collaborative and fair management of resources within each sub-catchment AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 4: People and community resilience	PC1-6718	Support the provision with amendments	RETAIN the Objective 4 staged approach AND AMEND PPC1 Rules to remove Nitrogen Reference Point and land use change restriction AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-6719	Support the provision with amendments	AMEND Objective 5 and PPC1 to acknowledge primary production as a core value to reflect Mana Tangata.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12664	Oppose the provision with amendments	AMEND Policy 1 to read: "...c. Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where <u>break feeding occurs.</u> <u>d. 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> " AND AMEND to provide clarification on how slope is measured, given the ranges of topography experienced within each paddock and adjoining watercourses.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12665	Support the provision with amendments	RETAIN Policy 1 managing diffuse discharges and water quality on a sub-catchment basis.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12666	Support the provision with amendments	AMEND Policy 1 to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-6721	Support the provision with amendments	AMEND PPC1 Rules to reflect Policies 1 and 9.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12958	Oppose the provision with amendments	DELETE the Nitrogen Reference Point from PPC1 Rules.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12959	Support the provision with amendments	AMEND PPC1 to reflect Policy 1 in adopting a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-6722	Support the provision with amendments	RETAIN the Policy 2 appropriate mitigation strategies to be adopted in the context of water quality gains, through a tailored Farm Environment Plan.
Policy 4: Enabling activities with lower discharges to continue or to be	PC1-6723	Support the provision with amendments	RETAIN the Policy 4 provisions allowing for low intensity land uses to continue and establish AND DELETE any signalling of future mitigation action requirements from Policy 4.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
established while signalling further change may be required in future			
Policy 5: Staged approach	PC1-6724	Support the provision with amendments	RETAIN the Policy 5 staged approach AND AMEND PPC1 Rules to remove Nitrogen Reference Point AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains, through a tailored Farm Environment Plan.
Policy 6: Restricting land use change	PC1-6725	Oppose the provision	AMEND Policy 6 to give high priority water quality sub-catchments a Restricted Discretionary Activity status AND AMEND to give low priority water quality sub-catchments a Permitted Activity status AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.
Policy 7: Preparing for allocation in the future	PC1-6727	Support the provision with amendments	RETAIN the Policy 7 reduction of diffuse discharges while considering land suitability AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan AND AMEND to have Waikato Regional Council work collaboratively with stakeholder groups to develop a sub-catchment management approach.
Policy 8: Prioritised implementation	PC1-6728	Support the provision	RETAIN Policy 8.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-6729	Support the provision with amendments	RETAIN Policy 9 managing water quality on a sub-catchment level AND AMEND PPC1 Rules to reflect Policy 1 and 9 AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.
Policy 10: Provide for point source discharges of regional significance	PC1-6733	Support the provision with amendments	RETAIN Policy 10 consideration of regional significance of point source discharges infrastructure and industry AND AMEND PPC1 to be holistic and include all sources influencing the health and well-being of the Waikato River and its catchments, including koi carp, point source discharges, and hydro-dams AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-6735	Support the provision with amendments	RETAIN Policy 11 application of Best Practicable Options AND AMEND to include all stakeholders in applying Best Practicable Options, for example through Farm Environment Plans AND AMEND to provide clarification on what is a 'significant toxic adverse effect' AND AMEND PPC1 Rules to reflect Policy 11.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-6736	Support the provision with amendments	RETAIN the Policy 12 consideration of past technology upgrades and costs associated with upgrading AND AMEND PPC1 to provide consideration of past technology upgrades and associated costs across all sources influencing the health and well-being of the Waikato and Waipā rivers AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within the region.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 13: Point sources consent duration	PC1-6738	Support the provision with amendments	RETAIN Policy 13 consideration of the consent duration in relation to the magnitude and significance of the investment made AND AMEND to include consideration of the magnitude and significance of the investment made for all property owners and enterprises within the Waikato and Waipā Catchments.
Policy 14: Lakes Freshwater Management Units	PC1-6739	Support the provision	RETAIN Policy 14.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-6741	Support the provision with amendments	RETAIN the Policy 16 flexibility for development of Māori land AND AMEND PPC1 to include a Rule to reflect Policy 16 AND AMEND to consider a similar flexibility for all property owners and enterprises.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-6752	Support the provision with amendments	RETAIN the Policy 17 application of policies and methods based on the Vision and Strategy AND WITHDRAW PPC1 until the withdrawn north-eastern portion of the catchment is included and the Vision and Strategy has been amended.
3.11.4.1 Working with others	PC1-6753	Support the provision	RETAIN Method 3.11.4.1.
3.11.4.2 Certified Industry Scheme	PC1-6754	Support the provision	RETAIN Method 3.11.4.2.
3.11.4.3 Farm Environment Plans	PC1-6756	Support the provision with amendments	RETAIN the Method 3.11.4.3 tailored, risk based Farm Environment Plan AND AMEND to enable land users with adequate experience and capabilities to work with an approved industry or scheme, run by Waikato Regional Council, to be accredited to develop their own Farm Environment Plan based upon a common template.
3.11.4.4 Lakes and Whangamarino Wetland	PC1-6757	Support the provision with amendments	RETAIN or REINSTATE Method 3.11.4.4 working with others in relation to lakes and Whangamarino Wetland AND RETAIN managing pest weeds and fish AND REINSTATE Method 3.11.4.4(d) to include Whangamarino Wetland AND AMEND PPC1 to include the management of pest weeds and fish in the policies, objectives and rules in the Waikato and Waipā Catchments.
3.11.4.5 Sub-catchment scale planning	PC1-6758	Support the provision with amendments	RETAIN Method 3.11.4.5 management of diffuse discharges and water quality on a sub-catchment level AND AMEND PPC1 to reflect Method 3.11.4.5 in the Rules.
3.11.4.6 Funding and implementation	PC1-6760	Support the provision	RETAIN Method 3.11.4.6.
3.11.4.7 Information needs to support any future allocation	PC1-6761	Support the provision with amendments	RETAIN Method 3.11.4.7 gaining data AND AMEND PPC1 to enable the management of diffuse discharges on a sub-catchment basis.
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-6762	Support the provision with amendments	RETAIN Method 3.11.4.8 gaining data AND AMEND PPC1 to enable the management of diffuse discharges on a sub-catchment basis.
3.11.4.9 Managing the effects of urban development	PC1-6763	Support the provision	RETAIN Method 3.11.4.9.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-6764	Support the provision	RETAIN Method 3.11.4.12.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-6765	Support the provision	RETAIN the Rule 3.11.5.1 enablement of low intensity land uses to continue and establish under a Permitted Activity status AND AMEND Rule 3.11.5.1(2) to read: "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" AND CLARIFY how and where to measure slope on undulating land.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-6766	Support the provision with amendments	RETAIN Rule 3.11.5.2 Permitted Activity status for low intensity land uses AND AMEND Rule 3.11.5.2 to read: "Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C <u>and conditions 3(e) and 4(e) of this rule for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs</u> ; and" AND AMEND PPC1 Rules to remove the Nitrogen Reference Point AND AMEND to address contaminants on a sub-catchment basis to enable targeting of the highest discharging sub-catchments AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored Farm Environment Plan AND AMEND the Rule 3.11.5.2 introduction to read: "The use of land for farming activities (excluding commercial vegetable production) and the associated diffuse discharge of nitrogen, phosphorous, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water where the property area is greater than 4.1 hectares, and has more than 6 stock units per hectare <u>but less than 18 stock units per hectare at the 30th June 2016</u> , or is used for arable cropping, is a permitted activity subject to the following conditions:" DELETE 3.11.5.2(3)(b)(i) AND AMEND Rule 3.11.5.4(c) to read: "No part of the property or enterprise over <del>15</del> 25 degree slope is cultivated <del>or grazed</del> <u>unless effects of diffuse discharges can be mitigated</u> , and" AND AMEND to provide clarification around stock exclusion requirements for setback buffers and where to measure setback from on undulating land.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-6767	Support the provision with amendments	RETAIN the Rule 3.11.5.3 Farm Environment Plans, Certified Industry Scheme, and stock exclusion where practical AND DELETE the Nitrogen Reference Point AND AMEND Rule 3.11.5.3(3) to read: "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" AND AMEND PPC1 to address contaminants on a sub-catchment basis to enable targeting of the highest discharging sub-catchments AND AMEND to clarify stock exclusion requirements for setback buffers and where to measure setback from on undulating land AND AMEND to clarify how long a Farm Environment Plan will be viable for.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-6768	Support the provision with amendments	RETAIN Rule 3.11.5.4 Farm Environment Plans, Certified Industry Scheme, and stock exclusion where practical AND DELETE the Nitrogen Reference Point AND AMEND to address contaminants on a sub-catchment basis to target highest discharging sub-catchments

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND the resource consent duration to 15 years or more AND AMEND to clarify stock exclusion requirements for setback buffers and where to measure setback from on undulating land AND AMEND to clarify how long a Farm Environment Plan will be viable for.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-6770	Oppose the provision	AMEND Rule 3.11.5.7 to address contaminants on a sub-catchment basis to enable targeting of the highest discharging sub-catchments AND AMEND the activity status from Non-complying to a Restricted Discretionary Activity for high priority sub-catchments, in relation to water quality, and limit discretion to the management of the diffuse discharges of the four contaminants AND AMEND the activity status to Permitted Activity for low priority sub-catchments, in relation to water quality AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.

## Wall, Trevor Matthew

Submitter ID: 72595

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-9666	Oppose the provision	WITHDRAW PPC1.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-11274	Oppose the provision	AMEND PPC1 to treat Māori-owned land in the same way as other land.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-9667	Oppose the provision	AMEND Rule 3.11.5.2 to increase stock units per hectare in line with present farming practice AND AMEND to calculate the Nitrogen Reference Point over a longer period.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-9669	Oppose the provision	AMEND Rule 3.11.5.7 to allow more flexibility to change use on a case by case basis AND AMEND to shorten the 10 year moratorium
Schedule B - Nitrogen Reference Point	PC1-9668	Oppose the provision	AMEND Schedule B so that PPC1 achieves the right mix between land type, land use and nitrogen use AND AMEND to develop a new system for managing nitrogen loss. AND AMEND to calculate the Nitrogen Reference Point over a longer period.

## Wallace, Martin Lindsay

Submitter ID: 72975

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7962	Oppose the provision with amendments	DELETE PPC1 in its entirety OR AMEND to the amendments sought within the submission. AND AMEND to include allocation approaches that are equitable, ensure efficient resource use, be future proofed, promote sustainable management, not reward current or historic poor practice. AND DELETE all forms of grandparenting from the plan and target reductions in order from the highest polluters first until water characteristics are met.
3.11.2 Objectives	PC1-8322	Support the provision	ADD a NEW Objective that requires property level allocation of discharges, prescribing that grandparenting or similar allocation methods will not be used, that fairly relates to the assimilative capacity of the land, water and their attributes, and not to historical practice.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-8254	Oppose the provision with amendments	AMEND Objective 1 to include water quality targets to establish freshwater objectives AND AMEND by ensuring freshwater limits for all freshwater management units give effect to the water quality objectives in the National Policy Statement for Freshwater Management especially ecosystem processes and indigenous species including their freshwater ecosystems.
Objective 3: 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	PC1-8255	Oppose the provision	DELETE Objective 3.
Objective 4: People and community resilience	PC1-8305	Oppose the provision with amendments	ADD a NEW Objective (a) to give priority to equity as a priority in formulating the staged approach with attention focused on the activities with the highest levels of effect on the water quality. AND AMEND existing Objective (a) as (b) so that it is subservient to (a). AND ADD a NEW clause to read: <u>"d) new impediments to the flexibility of the use of lands with low level discharges and effects are minimised."</u>
3.11.3 Policies	PC1-8329	Oppose the provision with amendments	AMEND 3.11.3 Policies to reflect the changes sought in the Objectives. AND AMEND to provide a policy that requires use of land suitability.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-8330	Oppose the provision with amendments	AMEND Objective 1 to read: "a) Enabling activities with low level of contaminant discharge to water bodies <del>provided these discharges do not increase;</del> b) Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges <u>in order, from highest to least and;</u> "
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-8334	Oppose the provision with amendments	DELETE Clause c) in Policy 2 OR AMEND to make clear that the sole purpose of the information is for the purpose of monitoring/testing the OVERSEER Model as a tool.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12960	Oppose the provision with amendments	(Policy 2) AMEND 3.11.3.2 d) to read: <del>"Requiring the degree of</del> <u>Require</u> reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <del>to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions) and proportionate to (and other ecosystem health parameters) by the dischargers (progressively from the highest to the least) to the extent necessary to meet</del> the scale of water quality improvement required in the sub-catchment [ <u>Reductions will be required from the highest dischargers until the water quality target is met</u> ]; and"
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-8350	Oppose the provision with amendments	AMEND Policy 3 Clause g) to read: <del>"The degree of</del> <u>Require</u> reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <del>is proportionate to the amount of current discharge (those discharging more are expected to make greater reductions) and other ecosystem health parameters) by the</del> <u>dischargers (progressively from the highest to the least) to the extent necessary to meet</u> the scale of water quality improvement required in the sub-catchment [ <u>Reductions will be required from the highest dischargers until the water quality target is met</u> ];" AND AMEND to include a 20% timeframe change.
Policy 6: Restricting land use change	PC1-8351	Oppose the provision with amendments	AMEND Policy 6 paragraph 1 to read: "Except as provided for in <u>Policy 1 and 2 (for low level discharges)</u> and Policy 16, land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens <u>above the sustainable property level</u> will generally not be granted." AND AMEND paragraph 2 to refer to the general granting of consents to only apply where the discharges are and will be below the sustainable property level for the sub-catchment target.
Policy 7: Preparing for allocation in the future	PC1-8352	Oppose the provision	No specific decision sought for Policy 7.
Policy 8: Prioritised implementation	PC1-8362	Oppose the provision with amendments	AMEND Policy 8 to reduce the percentile level to ensure it is the polluters, not those with a low footprint who take action. AND AMEND Policy 8 to provide a lower (50th) percentile nitrogen leaching value to be prioritised for Farm Environment Plans and in Matters of Control in consideration of resource consents; OR AMEND the reference to the 75th percentile to any nitrogen leaching value that exceeds the Nitrogen Discharge Limit applicable to the relevant property. AND AMEND Matter of Control ii. to read: "The actions and timeframes for undertaking mitigation actions, <u>where required</u> , that maintain or reduce the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens to water or to land where they may enter water". AND AMEND Matter of Control iii. to read: "The actions and timeframes and other measures to ensure that the diffuse discharge of nitrogen from the property or enterprise, as measured by the annual nitrogen loss as determined by the use of the current version of OVERSEER, does not increase beyond the property or enterprise's Nitrogen Discharge Limit." DELETE Matter of Control iv. if the option of a Nitrogen Discharge Limit is adopted.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-8355	Oppose the provision	DELETE Clause d) of Policy 9.
Policy 10: Provide for point source discharges of regional significance	PC1-8357	Oppose the provision	DELETE Policy 10.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-8359	Oppose the provision	DELETE Policy 17.
Schedule 1 - Requirements for Farm Environment Plans	PC1-8405	Oppose the provision with amendments	AMEND Schedule 1 Clause (5.a) to read: "Actions, timeframes and other measures to ensure that <del>the diffuse 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;</del> or discharges do not exceed the sustainable Nitrogen Discharge Limit." AND AMEND Clause (5.b) to refer to the 50th percentile in place of the 75th percentile in lines 1 and 2 OR DELETE if the Nitrogen Discharge Limit is adopted.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12553	Oppose the provision with amendments	AMEND Paragraph 2 to read: "The Farm Environment Plan shall identify all sources of sediment, nitrogen, phosphorus and microbial pathogens, and identify actions, timeframes for those actions to be completed, in order to reduce, <u>where required</u> , the diffuse discharges of these contaminants".
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-8261	Oppose the provision with amendments	AMEND Table 3.11-1 to include a 20% change within the 80 year time frame.
Additions to Glossary of Terms	PC1-8403	Support the provision	ADD a NEW definition that reads: " <u>Nitrogen Discharge Limit shall be determined for each property within a sub-catchment such that the nitrogen discharge targets of Objective 3 for the sub-catchment are met, with the highest discharges required to be reduced first.</u> "

## Walter, David Millais

Submitter ID: 73140

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule C - Stock exclusion	PC1-7955	Oppose the provision with amendments	AMEND Schedule C by excluding cattle horses, deer and pigs from water bodies with a continual flow of water over 1 metre wide, but not dams and smaller water bodies.

## Walter, Philip

Submitter ID: 71194

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 7: Preparing for allocation in the future	PC1-6615	Oppose the provision	AMEND Policy 7 to include a statement that future rules on 'land suitability' will be based on sound science.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-6624	Support the provision with amendments	DELETE the 25 degree slope provision AND REPLACE with farming intensity over 18 stock units per hectare AND AMEND the Farm Environmental Plan provisions so they focus on addressing actual risk, targeting critical source areas rather than requiring blanket stock exclusion AND identify the cause of sediment and nitrates in each sub-catchment and target them first.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-6630	Support the provision with amendments	DELETE the 25 degree slope provision AND REPLACE with farming intensity over 18 stock units per hectare AND AMEND the Farm Environmental Plan provisions so they focus on addressing actual risk, targeting critical source areas rather than requiring blanket stock exclusion AND identify the cause of sediment and nitrates in each sub-catchment and target them first.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-6632	Support the provision with amendments	DELETE the Nitrogen Reference Point provisions in Rule 3.11.5.3 for sheep and beef farmers with the Olsen Phosphorus test being a better tool AND DELETE the 25 degree slope provision AND REPLACE with farming intensity over 18 stock units per hectare AND AMEND the Farm Environmental Plan provisions so they focus on addressing actual risk, targeting critical source areas rather than requiring blanket stock exclusion AND AMEND to identify the cause of sediment and nitrates in each sub-catchment and target them first.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-6633	Support the provision with amendments	DELETE the Nitrogen Reference Point provisions in Rule 3.11.5.4 for sheep and beef farmers with the Olsen Phosphorus test being a better tool AND DELETE the 25 degree slope provision AND REPLACE with farming intensity over 18 stock units per hectare AND AMEND the Farm Environmental Plan provisions so they focus on addressing actual risk, targeting critical source areas rather than requiring blanket stock exclusion AND AMEND to identify the cause of sediment and nitrates in each sub-catchment and target them first.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-6617	Oppose the provision	DELETE the Nitrogen Reference Point provisions in Rule 3.11.5.5 for sheep and beef farmers with the Olsen Phosphorus test being a better tool.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-6620	Oppose the provision	DELETE the Nitrogen Reference Point provisions in Rule 3.11.5.6 for sheep and beef farmers with the Olsen Phosphorus test being a better tool.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-6622	Oppose the provision	DELETE the Nitrogen Reference Point provisions in Rule 3.11.5.7 for sheep and beef farmers with the Olsen Phosphorus test being a better tool.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-6623	Oppose the provision	DELETE the Nitrogen Reference Point provisions in Schedule B for sheep and beef farmers with the Olsen Phosphorus test being a better tool.
Schedule C - Stock exclusion	PC1-6631	Support the provision with amendments	DELETE the 25 degree slope provision AND REPLACE with farming intensity over 18 stock units per hectare AND AMEND the Farm Environmental Plan provisions so they focus on addressing actual risk, targeting critical source areas rather than requiring blanket stock exclusion AND identify the cause of sediment and nitrates in each sub-catchment and target them first.

## Walter and Doran, Peter Alan Susan and Casey

Submitter ID: 73078

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-9116	Oppose the provision with amendments	<b>Long Term Restoration</b> No specific decision sought. <b>Nitrogen Reference Point</b> DELETE the use of OVERSEER for obtaining the Nitrogen Reference Point. AND REPLACE with soil types and stock class to find the amount of nitrogen the soil can hold before leaching. AND AMEND to use sub-catchments to identify the amount of nitrogen loss and amount of nitrogen to be applied through scientific evidence not a grandparenting approach. AND AMEND so that farms not exceeding the 75th percentile can work on nitrogen applications for accumulating 5 year average.
Objective 4: People and community resilience	PC1-9117	Oppose the provision with amendments	DELETE the use of OVERSEER for obtaining the Nitrogen Reference Point. AND REPLACE with soil types and stock class to find the amount of nitrogen the soil can hold before leaching. AND AMEND to use sub-catchments to identify the amount of nitrogen loss and amount of nitrogen to be applied through scientific evidence not a grandparenting approach. AND AMEND so that farms not exceeding the 75th percentile can work on nitrogen applications for accumulating 5 year average.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-9118	Oppose the provision with amendments	Policy 2 - DELETE the use of the OVERSEER Model for obtaining the Nitrogen Reference Point. AND REPLACE with soil types and stock class to find the amount of nitrogen the soil can hold before leaching. AND AMEND to use sub-catchments to identify the amount of nitrogen loss and amount of nitrogen to be applied through scientific evidence not a grandparenting approach. AND AMEND so that farms not exceeding the 75th percentile can work on nitrogen applications for accumulating 5 year average.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12961	Support the provision with amendments	AMEND Policy 2 so that only main streams and rivers are fenced. AND AMEND so that areas of high stock concentration are fenced such as crossings. AND AMEND to use dams to help slow sediment loss.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND subsidise farmers with new fencing and/or water systems that may need to be introduced as an alternative.
Policy 7: Preparing for allocation in the future	PC1-9119	Oppose the provision with amendments	DELETE the use of OVERSEER for obtaining the Nitrogen Reference Point. AND REPLACE with soil types and stock class to find the amount of nitrogen the soil can hold before leaching. AND AMEND to use sub-catchments to identify the amount of nitrogen loss and amount of nitrogen to be applied through scientific evidence not a grandparenting approach. AND AMEND so that farms not exceeding the 75th percentile can work on nitrogen applications for accumulating 5 year average.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-11381	Oppose the provision	DELETE PPC1 AND AMEND Farm Environment Plans to assess the type of land to determine whether land use change is suitable based on topography and current land use.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-9120	Support the provision with amendments	<b>Nitrogen Reference Point</b> DELETE the use of the OVERSEER Model for obtaining the Nitrogen Reference Point. AND REPLACE with soil types and stock class to find the amount of nitrogen the soil can hold before leaching. AND AMEND to use sub-catchments to identify the amount of nitrogen loss and amount of nitrogen to be applied through scientific evidence not a grandparenting approach. AND AMEND so that farms not exceeding the 75th percentile can work on nitrogen applications for accumulating 5 year average. <b>Stock Exclusion</b> AMEND Rule 3.11.5.2 so that only main streams and rivers are fenced. AND AMEND so that areas of high stock concentration are fenced such as crossings. AND AMEND to use dams to help slow sediment loss. AND subsidise farmers with new fencing and/or water systems that may need to be introduced as an alternative.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-9121	Support the provision with amendments	<b>Nitrogen Reference Point</b> DELETE the use of the OVERSEER Model for obtaining the Nitrogen Reference Point. AND REPLACE with soil types and stock class to find the amount of nitrogen the soil can hold before leaching. AND AMEND to use sub-catchments to identify the amount of nitrogen loss and amount of nitrogen to be applied through scientific evidence not a grandparenting approach. AND AMEND so that farms not exceeding the 75th percentile can work on nitrogen applications for accumulating 5 year average. <b>Stock Exclusion</b> AMEND Rule 3.11.5.3 so that only main streams and rivers are fenced. AND AMEND so that areas of high stock concentration are fenced such as crossings. AND AMEND to use dams to help slow sediment loss. AND subsidise farmers with new fencing and/or water systems that may need to be introduced as an alternative.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-9122	Support the provision with amendments	<p><b>Nitrogen Reference Point</b>  DELETE the use of the OVERSEER Model for obtaining the Nitrogen Reference Point.  AND REPLACE with soil types and stock class to find the amount of nitrogen the soil can hold before leaching.  AND AMEND to use sub-catchments to identify the amount of nitrogen loss and amount of nitrogen to be applied through scientific evidence not a grandparenting approach.  AND AMEND so that farms not exceeding the 75th percentile can work on nitrogen applications for accumulating 5 year average.</p> <p><b>Stock Exclusion</b>  AMEND Rule 3.11.5.4 so that only main streams and rivers are fenced.  AND AMEND so that areas of high stock concentration are fenced such as crossings.  AND AMEND to use dams to help slow sediment loss.  AND subsidise farmers with new fencing and/or water systems that may need to be introduced as an alternative.</p>
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-9123	Support the provision with amendments	<p><b>Nitrogen Reference Point</b>  DELETE the use of the OVERSEER Model for obtaining the Nitrogen Reference Point.  AND REPLACE with soil types and stock class to find the amount of nitrogen the soil can hold before leaching.  AND AMEND to use sub-catchments to identify the amount of nitrogen loss and amount of nitrogen to be applied through scientific evidence not a grandparenting approach.  AND AMEND so that farms not exceeding the 75th percentile can work on nitrogen applications for accumulating 5 year average.</p> <p><b>Stock Exclusion</b>  AMEND Rule 3.11.5.5 so that only main streams and rivers are fenced.  AND AMEND so that areas of high stock concentration are fenced such as crossings.  AND AMEND to use dams to help slow sediment loss.  AND subsidise farmers with new fencing and/or water systems that may need to be introduced as an alternative.</p>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-9124	Oppose the provision with amendments	<p><b>Nitrogen Reference Point</b>  DELETE the use of the OVERSEER Model for obtaining the Nitrogen Reference Point.  AND REPLACE with soil types and stock class to find the amount of nitrogen the soil can hold before leaching.  AND AMEND to use sub-catchments to identify the amount of nitrogen loss and amount of nitrogen to be applied through scientific evidence not a grandparenting approach.  AND AMEND so that farms not exceeding the 75th percentile can work on nitrogen applications for accumulating 5 year average.</p>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13126	Support the provision with amendments	<p><b>Stock Exclusion</b>  AMEND Rule 3.11.5.6 so that only main streams and rivers are fenced.  AND AMEND so that areas of high stock concentration are fenced such as crossings.  AND AMEND to use dams to help slow sediment loss.  AND subsidise farmers with new fencing and/or water systems that may need to be introduced as an alternative.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-8683	Oppose the provision	<p><b>Land Use Change</b> DELETE PPC1 AND AMEND Farm Environment Plans to assess the type of land to determine whether land use change is suitable based on topography and current land use.</p> <p><b>Nitrogen Reference Point</b> DELETE the use of OVERSEER for obtaining the Nitrogen Reference Point. AND REPLACE with soil types and stock class to find the amount of nitrogen the soil can hold before leaching. AND AMEND to use sub-catchments to identify the amount of nitrogen loss and amount of nitrogen to be applied through scientific evidence not a grandparenting approach. AND AMEND so that farms not exceeding the 75th percentile can work on nitrogen applications for accumulating 5 year average.</p> <p><b>Stock Exclusion</b> AMEND Rule 3.11.5.7 so that only main streams and rivers are fenced. AND AMEND so that areas of high stock concentration are fenced such as crossings. AND AMEND to use dams to help slow sediment loss. AND subsidise farmers with new fencing and/or water systems that may need to be introduced as an alternative.</p>
Schedule B - Nitrogen Reference Point	PC1-8687	Oppose the provision with amendments	<p>DELETE the use of OVERSEER for obtaining the Nitrogen Reference Point. AND REPLACE with soil types and stock class to find the amount of nitrogen the soil can hold before leaching. AND AMEND to use sub-catchments to identify the amount of nitrogen loss and amount of nitrogen to be applied through scientific evidence not a grandparenting approach. AND AMEND so that farms not exceeding the 75th percentile can work on nitrogen applications for accumulating 5 year average.</p>
Schedule C - Stock exclusion	PC1-8715	Support the provision with amendments	<p>AMEND Schedule C so that only main streams and rivers are fenced AND AMEND so that areas of high stock concentration are fenced such as crossings AND AMEND to use dams to help slow sediment loss AND subsidise farmers with new fencing and/or water systems that may need to be introduced as an alternative.</p>

## Walters, Tom

Submitter ID: 74143

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-10092	Support the provision	RETAIN PPC1.

## Ward, Bruce

Submitter ID: 73286

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8202	Support the provision	Reinstate Policy 15 as originally proposed.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-7268	Support the provision with amendments	AMEND Policy 1a to read - "Enabling activities with a low level of contaminant discharge to water bodies provided those discharges <u>reduce if higher than that set by Government's National Policy freshwater standards do not increase</u> " AND AMEND Policy 1b to read - "Requiring <u>all</u> farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges".
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12667	Oppose the provision with amendments	AMEND Policy 1c to read - "Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes <u>whether they flow all year (with water) or part of the year, no matter how wide or deep</u> ".
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-7273	Oppose the provision	AMEND Policy 2c as follows - "Establishing a Nitrogen Reference Point for the property <del>or</del> enterprise".
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12963	Support the provision with amendments	AMEND the Farm Environment Plan provisions of PPC1 so that the Waikato Regional Council will pay for the plans to be done.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12962	Oppose the provision	AMEND Policy 2e to remove the three year requirement to complete stock exclusion and REPLACE it with a date determined on a case by case basis.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-7278	Oppose the provision	AMEND Policy 4 so that all farming activities are making 100% effort to achieve the 10 year target.
Policy 5: Staged approach	PC1-7280	Support the provision	RETAIN Policy 5
Policy 6: Restricting land use change	PC1-7282	Support the provision with amendments	AMEND Policy 6 so each property has its own Nitrogen Reference Point.
Policy 7: Preparing for allocation in the future	PC1-7285	Oppose the provision	DELETE the reference to 'modelling tools' from Policy 7. AND AMEND PPC1 so that, where necessary, the government provides compensation to retire and destock land. DELETE Policy 7b.
Policy 8: Prioritised implementation	PC1-7290	Support the provision	RETAIN Policy 8.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-7365	Support the provision with amendments	AMEND Policy 9b to read - "Assessing the reasons for current water quality and sources of contaminant discharge, at various scales in a sub-catchment <u>and must be factual for each water body</u> ". RETAIN Policy 9c. AMEND PPC1 so that all properties have their own Nitrogen Reference Point and they cannot choose one to represent multiple properties.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 10: Provide for point source discharges of regional significance	PC1-7375	Oppose the provision	DELETE Policy 10 and require regionally significant infrastructure and industry to comply with the plan rules by 1 July 2026.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-7388	Oppose the provision	AMEND Policy 11a to read - "Primary discharge does not result in any significant toxic adverse effect at the point source discharge location". DELETE the use of offsets from PPC1.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-7396	Oppose the provision	DELETE Policy 12a. DELETE Policy 12b. DELETE Policy 12c and require point source polluters to take mitigation actions immediately.
Policy 13: Point sources consent duration	PC1-7400	Oppose the provision	DELETE Policy 13a.
Policy 14: Lakes Freshwater Management Units	PC1-7404	Support the provision	RETAIN Policy 14.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-7406	Oppose the provision	DELETE Policy 16.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-7408	Support the provision	RETAIN Policy 17.
3.11.4.2 Certified Industry Scheme	PC1-7506	Oppose the provision	No specific decision requested for Method 3.11.4.2.
3.11.4.3 Farm Environment Plans	PC1-7508	Support the provision with amendments	No specific decision requested for Method 3.11.4.3.
3.11.4.6 Funding and implementation	PC1-7510	Support the provision with amendments	AMEND Method 3.11.4.6 so that implementation funding is sourced through the Uniform Annual General Charge.
3.11.4.7 Information needs to support any future allocation	PC1-7511	Support the provision with amendments	AMEND PPC1 so that funding is sought to retire the worst land and to purchase land to re-establish wetlands. AND AMEND Method 3.11.4.7 b (iii) to state - "Tools for measuring or modelling discharges from individual properties, enterprises and sub-catchments..."
3.11.4.9 Managing the effects of urban development	PC1-7517	Support the provision with amendments	AMEND Method 3.11.4.9 so urban developments must comply with policies to achieve Objective 1. AND AMEND Method 3.11.4.9 so that when consent for an urban development is assessed it is considered they were operating at full capacity/occupancy.
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-7518	Support the provision with amendments	AMEND PPC1 so that point source dischargers have to contribute to achieving the 10 year first stage targets of PPC1.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-7519	Oppose the provision	AMEND PPC1 to allow the Nitrogen Reference Point to be calculated based on farm specific conditions, not just the two year period identified. AND AMEND point 4(b)(iii) of Rule 3.11.5.2 to replace the 15 kgN/ha/yr provision with a more realistic number. AND AMEND point 4(c) of Rule 3.11.5.2 to allow for cultivation on land >35 degrees and grazing on land 80 [?] degrees.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND DELETE point 4(d) of Rule 3.11.5.2.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-7538	Oppose the provision	AMEND Rule 3.11.5.3 so that the cost of the preparation of a Farm Environment Plan under a Certified Industry Scheme is borne by the Waikato Regional Council AND AMEND PPC1 to allow the Nitrogen Reference Point to be calculated based on a five year period AND if not adopted AMEND PPC1 so that commercial vegetable producers have a two year (2014/15 and 2015/16) period to base their Nitrogen Reference Point on.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-7539	Oppose the provision	AMEND PPC1 to allow the Nitrogen Reference Point to be calculated based on the best of ten years so farmers are treated the same as commercial vegetable producers. AND if not adopted AMEND PPC1 so that commercial vegetable producers have a two year (2014/15 and 2015/16) period to base their Nitrogen Reference Point on, the same as farmers.

## Ward, Simeon

Submitter ID: 72665

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-10963	Oppose the provision	AMEND PPC1 and adopt a partnership approach to working with farmers who are committed to improving water quality while maintaining economically viable businesses.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-10964	Oppose the provision	AMEND Rule 3.11.5.3 as requested by the Federated Farmers submission. [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is: 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 REMOVE Rule 3.11.5.2 (4) (c). AND ADD a NEW permitted activity rule to read: <u>"The use of land for farming activities (excluding commercial vegetable production) where the property area is greater than 4.1 hectares is a Permitted Activity provided that:</u> <u>1) The change in the use of land is not from non-milking dairy farming to milking dairy farming; or</u> <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> <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> AND AMEND PPC1 so that normal farming activities in rural areas are permitted activities. AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities.]

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-10965	Oppose the provision	<p>AMEND Rule 3.11.5.4 as requested by the Federated Farmers submission.</p> <p>[Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is:</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.</p> <p>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.</p> <p>AND REMOVE Rule 3.11.5.2 (4) (c).</p> <p>AND ADD a NEW permitted activity rule to read:</p> <p><u>"The use of land for farming activities (excluding 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>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-10966	Oppose the provision	<p>AMEND Rule 3.11.5.7 as requested by the Federated Farmers submission.</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>
Schedule B - Nitrogen Reference Point	PC1-10967	Oppose the provision	<p>AMEND Schedule B as requested by the Federated Farmers submission.</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>
Schedule C - Stock exclusion	PC1-10968	Oppose the provision	<p>AMEND Schedule C as requested by the Federated Farmers submission.</p> <p>[AMEND Schedule C 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 C</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 C match the Policies, Methods, definitions, etc. to which Schedule C relates</p>



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND REMOVE requirements for fencing off water bodies AND AMEND to adopt the Government's Clean Water Package 2017 stock exclusion standards as an interim measure AND DEVELOP more detailed proposals at a sub-catchment level later, through a freshwater management unit based assessment, and implemented then through a sub-catchment based plan change AND MAKE any consequential amendments to PPC1.]
Schedule 1 - Requirements for Farm Environment Plans	PC1-10969	Oppose the provision	AMEND Schedule 1 as requested by the Federated Farmers submission. [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.]

## Ward, Theodora C.

Submitter ID: 61004

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-5991	Not stated	AMEND Rule 3.11.5.3 to allow Farm Environment Plans to reflect that levels of applied nutrients are difficult to evaluate on an annual basis due to market forces and return for produce particularly in the drystock industry.
Schedule C - Stock exclusion	PC1-5990	Not stated	AMEND Schedule C to reflect the impracticality of requiring fencing, providing supplementary water supplies and stocking crossing structures along water bodies on land with a 15 degrees slope or land between 15 and 25 degrees slope and with a stocking rate of 6 stock units. AND AMEND Farm Environment Plans requirements to reflect the fact that levels of applied nutrients are difficult to evaluate on an annual basis due to market forces and return for produce particularly in the drystock industry.
Schedule 1 - Requirements for Farm Environment Plans	PC1-5992	Not stated	AMEND Farm Environment Plans to consider that levels of applied nutrients are difficult to evaluate on an annual basis due to market forces and return for produce particularly in the drystock industry. (Schedule 1)

## Ward-Allen, William Alec

Submitter ID: 74147

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-9868	Oppose the provision	No specific relief sought for Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-9869	Oppose the provision	AMEND Policy 2 to REMOVE the need to establish a Nitrogen Reference Point.
Policy 7: Preparing for allocation in the future	PC1-9872	Oppose the provision	AMEND Policy 7 to REMOVE the need to establish a Nitrogen Reference Point.
Schedule B - Nitrogen Reference Point	PC1-9873	Oppose the provision	AMEND Schedule B to REMOVE the need to establish a Nitrogen Reference Point.
Schedule C - Stock exclusion	PC1-9870	Oppose the provision	No specific relief sought for Schedule C.

## Washer and Co Ltd

Submitter ID: 73973

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8609	Oppose the provision	No specific decision sought for PPC1.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-8601	Oppose the provision	AMEND Policy 1 to remove the restriction on nitrogen use in hill country.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-8603	Oppose the provision	AMEND Policy 2 to remove the restriction on nitrogen use in hill country.
3.11.5 Rules	PC1-11238	Oppose the provision with amendments	AMEND PPC1 Rules to remove the restriction on nitrogen use in hill country
Schedule B - Nitrogen Reference Point	PC1-8608	Oppose the provision	AMEND Schedule B to remove the restriction on nitrogen use in hill country.
Schedule C - Stock exclusion	PC1-8602	Support the provision with amendments	RETAIN Schedule C fencing of waterways on flat land AND REMOVE the requirement to fence headwaters in steep hill country AND REMOVE the requirement to do riparian planting of headwaters in steep hill country.

# Watercare Services Ltd

Submitter ID: 74077

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8454	Support the provision with amendments	AMEND PPC1 to address concerns about meeting the requirements of the Resource Management Act, giving effect to the National Policy Statement for Freshwater Management, the National Policy Statement on Urban Development Capacity and the Waikato Regional Policy Statement. AND AMEND provisions to assist with the workability of PPC1 to remove ambiguity, improve clarity and aid interpretation. AND CONSIDER the adequacy of the Section 32 analysis and if it meets the requirements of the Resource Management Act.
3.11.1 Values and uses for the Waikato and Waipa Rivers	PC1-8341	Support the provision with amendments	CLARIFY how the process prescribed in the National Policy Statement for Freshwater Management for developing freshwater objectives and values for Freshwater Management Units relates to the process followed in developing PPC1. AND CLARIFY whether the objectives and values in PPC1 have been developed and designed to give effect to the requirements of the National Policy Statement for Freshwater Management and particularly Policies CA1-CA4. AND AMEND the section 3.11.1 Values and Uses to clarify the status of the values table's i.e are they objectives, policies or methods. AND AMEND PPC1 to clarify how the values tables are to be applied when assessing resource consent applications (e.g. are they applied as assessment criteria). AND AMEND the Values and Uses to clarify the nature and the content of the two columns of each value and uses table AND AMEND the Values and Uses to clarify the purpose of the three headings that apply to each value and uses table. AND AMEND the Use Value - water supply table to refer to 'domestic or municipal supply' and refer to the need for water to be available for existing and future domestic or municipal supply. AND ADD to the Values and Uses a new values table that relates solely to municipal processes. The table should include provisions relating to the use of rivers for municipal processes and the importance of the rivers assimilative capacity for discharges from municipal waste water treatment plants and from other municipal activities. The new table should recognise the benefits of these activities (municipal processes) in terms of the health, safety and social and economic well-beings of communities and for enabling their future growth.
3.11.2 Objectives	PC1-8450	Support the provision with amendments	AMEND PPC1 objectives and policies so they are RMA statutory plan objectives and policies and reflect best practice RMA plan drafting. AND AMEND the objectives and policies to clearly identify the objectives and policies that apply to farming activities and those that apply to municipal discharges.
3.11.3 Policies	PC1-8455	Support the provision with amendments	AMEND PPC1 objectives and policies so they are RMA statutory plan objectives and policies and reflect best practice RMA plan drafting. AND AMEND the objectives and policies to clearly identify the objectives and policies that apply to farming activities and those that apply to municipal discharges.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 10: Provide for point source discharges of regional significance	PC1-8339	Support the provision with amendments	RETAIN Policy 10. AND AMEND Policy 10 to include the future development of regionally significant infrastructure to service future growth. AND ADD to the glossary of terms the definition of the regionally significant infrastructure as defined in the Waikato Regional Policy Statement.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-8122	Support the provision with amendments	RETAIN Policy 11. AND AMEND to be consistent with the RMA by relating the requirements for Best Practical Option to consideration of options to determine the best practicable one to prevent or minimise adverse effects. AND AMEND to be consistent with the RMA by relating the requirements for offsetting to residual effects that are significant adverse effects. AND AMEND to reflect best practice RMA policy drafting. AND AMEND to split into a Best Practical Option Policy and an offsetting policy.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-8151	Support the provision with amendments	RETAIN Policy 12. AND AMEND so that the applicants and decision makers are required to 'have particular regard to' the matters set out in Policy 12(a) to (d). AND AMEND Policy 12(b) to split into two parts. The first relating to technology upgrades and the second modelling and monitoring.
Policy 13: Point sources consent duration	PC1-8337	Support the provision with amendments	RETAIN Policy 13. AND AMEND Policy 13 to clarify that matters a) to c) must be considered when determining the duration of any resource consent. AND AMEND Policy 13 a) to clarify that consent applicants are required to demonstrate the extent to which Polices 11 and 12 will be met. AND AMEND to include the need to provide infrastructure to meet servicing requirements for long-term growth. AND AMEND Policy 13 to reflect best practice RMA policy drafting.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-8435	Support the provision with amendments	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 long term water quality targets for Total Nitrogen, Total Phosphorus and Chlorophyll-a to recognises the gradual deterioration of water quality along the length of the Waikato River and the artificial boundaries between the upper and lower catchment be removed.
Additions to Glossary of Terms	PC1-8340	Support the provision with amendments	ADD to the Glossary of terms the definition of regionally significant infrastructure as defined in the Waikato Regional Policy Statement.

## Waterworth, Ashley

Submitter ID: 73180

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-6554	Support the provision	RETAIN the OVERSEER Model in its current state. AND RETAIN the Nitrogen Reference Point. AND RETAIN flexibility to move Nitrogen Reference Point across enterprises in the same sub-catchment. AND AMEND to ensure that the 75th percentile includes the dairy sector.
Schedule B - Nitrogen Reference Point	PC1-6559	Support the provision	RETAIN the OVERSEER Model in its current state. AND RETAIN the Nitrogen Reference Point. AND RETAIN flexibility to move Nitrogen Reference Point across enterprises in the same sub-catchment. AND AMEND to ensure that the 75th percentile includes the dairy sector.
Schedule 1 - Requirements for Farm Environment Plans	PC1-6555	Support the provision	AMEND Schedule 1 to provide flexibility for cultivation and winter cropping on land irrespective of slope.
Schedule 1 - Requirements for Farm Environment Plans	PC1-6557	Support the provision	AMEND Schedule 1 to provide flexibility for cultivation and winter cropping on land irrespective of slope.

## Waterworth, Bruce Kenrick

Submitter ID: 71442

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-1224	Support the provision	RETAIN Objective 1 the Nitrogen Reference Point calculation. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
Objective 4: People and community resilience	PC1-1226	Support the provision	RETAIN Objective 4 the Nitrogen Reference Point calculation. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-2521	Support the provision	RETAIN Policy 2 the Nitrogen Reference Point calculation. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
Policy 6: Restricting land use change	PC1-1213	Oppose the provision	AMEND Policy 6 to apply to all land equally.
Policy 7: Preparing for allocation in the future	PC1-2523	Oppose the provision with amendments	RETAIN Policy 7 the Nitrogen Reference Point calculation. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment. AND AMEND to apply flexibility of development to all land equally.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-1223	Oppose the provision	AMEND Policy 16 to apply to all land equally.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-2524	Support the provision	RETAIN Rule 3.11.5.2 the Nitrogen Reference Point calculation. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-2526	Support the provision	RETAIN Rule 3.11.5.3 the Nitrogen Reference Point calculation. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-2527	Support the provision	RETAIN Rule 3.11.5.4 the Nitrogen Reference Point calculation. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-2528	Support the provision	RETAIN Rule 3.11.5.5 the Nitrogen Reference Point calculation. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-2529	Support the provision	RETAIN Rule 3.11.5.6 the Nitrogen Reference Point calculation. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-2530	Support the provision	RETAIN Rule 3.11.5.7 the Nitrogen Reference Point calculation. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
Schedule B - Nitrogen Reference Point	PC1-2531	Support the provision	RETAIN Schedule B the Nitrogen Reference Point calculation. AND RETAIN the use of the current version of OVERSEER to calculate the Nitrogen Reference Point. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
Schedule 1 - Requirements for Farm Environment Plans	PC1-2532	Support the provision	RETAIN Schedule 1 the Nitrogen Reference Point calculation AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12554	Support the provision	RETAIN Schedule 1 Farm Environment Plans.

## Waterworth, Jenefer Fay

Submitter ID: 71438

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-1541	Support the provision with amendments	AMEND Objective 1 to include the dairy sector within the 75th percentile nitrogen leaching value. AND RETAIN the Nitrogen Reference Point being calculated over the 2014/2015 and 2015/2016 financial years. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
Objective 4: People and community resilience	PC1-1544	Support the provision with amendments	AMEND Objective 4 to include the dairy sector within the 75th percentile nitrogen leaching value. AND RETAIN the Nitrogen Reference Point being calculated over the 2014/2015 and 2015/2016 financial years. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-1546	Support the provision with amendments	AMEND Policy 2 to include the dairy sector within the 75th percentile nitrogen leaching value. AND RETAIN the Nitrogen Reference Point being calculated over the 2014/2015 and 2015/2016 financial years. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
Policy 6: Restricting land use change	PC1-1540	Oppose the provision	DELETE Policy 6 so all land is treated the same.
Policy 7: Preparing for allocation in the future	PC1-1534	Oppose the provision	DELETE Policy 7b so that all land is treated the same.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-1535	Oppose the provision	DELETE Policy 16 so all land is treated the same.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-1550	Support the provision with amendments	AMEND Rule 3.11.5.2 to include the dairy sector within the 75th percentile nitrogen leaching value. AND RETAIN the Nitrogen Reference Point being calculated over the 2014/2015 and 2015/2016 financial years. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-1551	Support the provision with amendments	AMEND Rule 3.11.5.3 to include the dairy sector within the 75th percentile nitrogen leaching value. AND RETAIN the Nitrogen Reference Point being calculated over the 2014/2015 and 2015/2016 financial years. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-1552	Support the provision with amendments	AMEND Rule 3.11.5.4 to include the dairy sector within the 75th percentile nitrogen leaching value. AND RETAIN the Nitrogen Reference Point being calculated over the 2014/2015 and 2015/2016 financial years. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-1554	Support the provision with amendments	AMEND Rule 3.11.5.5 to include the dairy sector within the 75th percentile nitrogen leaching value. AND RETAIN the Nitrogen Reference Point being calculated over the 2014/2015 and 2015/2016 financial years. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-1555	Support the provision with amendments	AMEND Rule 3.11.5.6 to include the dairy sector within the 75th percentile nitrogen leaching value. AND RETAIN the Nitrogen Reference Point being calculated over the 2014/2015 and 2015/2016 financial years. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-1557	Support the provision with amendments	AMEND Rule 3.11.5.7 to include the dairy sector within the 75th percentile nitrogen leaching value. AND RETAIN the Nitrogen Reference Point being calculated over the 2014/2015 and 2015/2016 financial years. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
Schedule B - Nitrogen Reference Point	PC1-1571	Support the provision	AMEND schedule B to include the dairy sector within the 75th percentile nitrogen leaching value. AND RETAIN the Nitrogen Reference Point being calculated over the 2014/2015 and 2015/2016 financial years. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment. AND RETAIN the use of the current version of the OVERSEER Model.
Schedule 1 - Requirements for Farm Environment Plans	PC1-1574	Support the provision	RETAIN in Schedule 1 the use a Farm Environment Plan to allow land to be cultivated irrespective of slope.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12555	Support the provision	AMEND Schedule 1 to include the dairy sector within the 75th percentile nitrogen leaching value.

## Waterworth, Lewis Bruce

Submitter ID: 71444

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-1512	Support the provision	RETAIN in Objective 1 the Nitrogen Reference Point being calculated using the highest leaching loss over the reference period using 2014/2015 and 2015/2016 financial year. AND RETAIN using the current version of OVERSEER to calculate the Nitrogen Reference Point. AND RETAIN that the 75th percentile leaching value includes the dairy sector. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
Objective 4: People and community resilience	PC1-1514	Support the provision	RETAIN the Nitrogen Reference Point being calculated using the highest leaching loss over the reference period using 2014/2015 and 2015/2016 financial year. Objective 4



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND RETAIN using the current version of OVERSEER to calculate the Nitrogen Reference Point. AND RETAIN that the 75th percentile nitrogen leaching value includes the dairy sector. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-1515	Support the provision	RETAIN Policy 2 the Nitrogen Reference Point being calculated using the highest leaching loss over the reference period using 2014/2015 and 2015/2016 financial year. AND RETAIN using the current version of OVERSEER to calculate the Nitrogen Reference Point AND RETAIN that the 75th percentile nitrogen leaching value includes the dairy sector. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12964	Support the provision	AMEND Policy 2 so that there is the ability for cultivation of land irrespective of slope using a Farm Environment Plans.
Policy 6: Restricting land use change	PC1-1508	Oppose the provision	DELETE Policy 6 AND AMEND to a land use change policy that covers the whole of Waikato and Waipā River catchments and applies to all land equally.
Policy 7: Preparing for allocation in the future	PC1-1509	Support the provision with amendments	DELETE the provision AND AMEND Policy 7 to a land use change policy that covers the whole of Waikato and Waipā River catchments and applies to all land equally. RETAIN the Nitrogen Reference Point being calculated using the highest leaching loss over the reference period using 2014/2015 and 2015/2016 financial year. RETAIN using the current version of OVERSEER to calculate the Nitrogen Reference Point. RETAIN that the 75th percentile leaching value includes the dairy sector. RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-1510	Oppose the provision	DELETE Policy 16 AND AMEND to a land use change policy that covers the whole of Waikato and Waipā River catchments and applies to all land equally.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-1517	Support the provision	RETAIN Rule 3.11.5.2 the Nitrogen Reference Point being calculated using the highest leaching loss over the reference period using 2014/2015 and 2015/2016 financial year. AND RETAIN using the current version of OVERSEER to calculate the Nitrogen Reference Point. AND RETAIN that the 75th percentile nitrogen leaching value includes the dairy sector. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-1518	Support the provision	RETAIN Rule 3.11.5.3 the Nitrogen Reference Point being calculated using the highest leaching loss over the reference period using 2014/2015 and 2015/2016 financial year. AND RETAIN using the current version of OVERSEER to calculate the Nitrogen Reference Point AND RETAIN that the 75th percentile nitrogen leaching value includes the dairy sector. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND so that there is the ability for cultivation of land irrespective of slope using a Farm Environment Plans.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-1520	Support the provision	RETAIN in Rule 3.11.5.4 the Nitrogen Reference Point being calculated using the highest leaching loss over the reference period using 2014/2015 and 2015/2016 financial year. AND RETAIN using the current version of OVERSEER to calculate the Nitrogen Reference Point AND RETAIN that the 75th percentile nitrogen leaching value includes the dairy sector. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment. AND AMEND so that there is the ability for cultivation of land irrespective of slope using a Farm Environment Plans.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-1522	Support the provision	RETAIN Rule 3.11.5.5 provisions relating to the Nitrogen Reference Point being calculated using the highest leaching loss over the reference period using 2014/2015 and 2015/2016 financial year. AND RETAIN using the current version of OVERSEER to calculate the Nitrogen Reference Point. AND RETAIN that the 75th percentile nitrogen leaching value includes the dairy sector. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-1523	Support the provision	RETAIN Rule 3.11.5.6 provisions relating to the Nitrogen Reference Point being calculated using the highest leaching loss over the reference period using 2014/2015 and 2015/2016 financial year. AND RETAIN using the current version of OVERSEER to calculate the Nitrogen Reference Point. AND RETAIN that the 75th percentile nitrogen leaching value includes the dairy sector. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13127	Support the provision	AMEND Rule 3.11.5.6 so that there is the ability for cultivation of land irrespective of slope using a Farm Environment Plans.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-1526	Support the provision	RETAIN Rule 3.11.5.7 provisions relating to the Nitrogen Reference Point being calculated using the highest leaching loss over the reference period using 2014/2015 and 2015/2016 financial year. AND RETAIN using the current version of OVERSEER to calculate the Nitrogen Reference Point AND RETAIN that the 75th percentile nitrogen leaching value includes the dairy sector. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
Schedule B - Nitrogen Reference Point	PC1-1527	Support the provision	RETAIN Schedule B provisions relating to the Nitrogen Reference Point being calculated using the highest leaching loss over the reference period using 2014/2015 and 2015/2016 financial year. AND RETAIN using the current version of OVERSEER to calculate the Nitrogen Reference Point AND RETAIN that the 75th percentile nitrogen leaching value includes the dairy sector. AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment.
Schedule 1 - Requirements for Farm Environment Plans	PC1-1528	Support the provision	RETAIN Schedule 1 provisions relating to the Nitrogen Reference Point being calculated using the highest leaching loss over the reference period using 2014/2015 and 2015/2016 financial year AND RETAIN using the current version of OVERSEER to calculate the Nitrogen Reference Point AND RETAIN that the 75th percentile nitrogen leaching value includes the dairy sector

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND RETAIN the flexibility to move the Nitrogen Reference Point across enterprises in the same sub-catchment AND AMEND so that there is the ability for cultivation of land irrespective of slope using a Farm Environment Plans.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12556	Support the provision	AMEND Schedule 1 so that there is the ability for cultivation of land irrespective of slope using a Farm Environment Plans.

## Waterworth, Serena

Submitter ID: 71437

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-8561	Support the provision	RETAIN Objective 1, AND AMEND to provide flexibility to move Nitrogen Reference Points across enterprises in the same sub-catchment.
Objective 4: People and community resilience	PC1-8562	Support the provision	RETAIN Objective 4 AND AMEND to provide flexibility to move Nitrogen Reference Points across enterprises in the same sub-catchment.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-8564	Support the provision with amendments	RETAIN Policy 2 AND AMEND to provide flexibility to move Nitrogen Reference Points across enterprises in the same sub-catchment.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12965	Support the provision with amendments	AMEND Policy 2 to provide flexibility for cultivation and winter cropping on land irrespective of slope through Farm Environment Plans.
Policy 7: Preparing for allocation in the future	PC1-8565	Support the provision	RETAIN Policy 7, AND AMEND to provide flexibility to move Nitrogen Reference Points across enterprises in the same sub-catchment.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-8596	Support the provision	RETAIN Policy 9 (d).
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-8566	Support the provision	RETAIN Rule 3.11.5.2, AND AMEND to provide flexibility to move Nitrogen Reference Points across enterprises in the same sub-catchment.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-8567	Support the provision	RETAIN Rule 3.11.5.3, AND AMEND to provide flexibility for cultivation and winter cropping on land irrespective of slope through Farm Environment Plans,

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to provide flexibility to move Nitrogen Reference Points across enterprises in the same sub-catchment.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-8568	Support the provision	RETAIN Rule 3.11.5.4, AND AMEND to provide flexibility for cultivation and winter cropping on land irrespective of slope through Farm Environment Plans, AND AMEND to provide flexibility to move Nitrogen Reference Points across enterprises in the same sub-catchment.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-8569	Support the provision	RETAIN Rule 3.11.5.5, AND AMEND to provide flexibility to move Nitrogen Reference Points across enterprises in the same sub-catchment.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-8570	Support the provision	RETAIN Rule 3.11.5.6 AND AMEND to provide flexibility to move Nitrogen Reference Points across enterprises in the same sub-catchment.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13128	Support the provision	RETAIN Rule 3.11.5.6 AND AMEND to provide flexibility for cultivation and winter cropping on land irrespective of slope through Farm Environment Plans.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-8572	Support the provision	RETAIN Rule 3.11.5.7, AND AMEND to provide flexibility to move Nitrogen Reference Points across enterprises in the same sub-catchment.
Schedule B - Nitrogen Reference Point	PC1-8573	Support the provision	RETAIN Schedule B, AND AMEND to provide flexibility to move Nitrogen Reference Points across enterprises in the same sub-catchment.
Schedule 1 - Requirements for Farm Environment Plans	PC1-8574	Support the provision	RETAIN Schedule 1 AND AMEND to provide flexibility to move Nitrogen Reference Points across enterprises in the same sub-catchment.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12557	Support the provision	RETAIN Schedule 1 AND AMEND to provide flexibility for cultivation and winter cropping on land irrespective of slope through Farm Environment Plans.

## Watkins, Lloyd Murray

Submitter ID: 73529

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6128	Support the provision with amendments	AMEND to address in PPC1 the concerns in the submission about rural communities reliance on sustainable farming operations and as much as possible businesses have a level playing field.
3.11.3 Policies	PC1-6119	Oppose the provision	AMEND PPC1 Policies so that it's fair for all farming operations. AND AMEND PPC1 to shift from the grandparenting approach to a fair and measured system. AND AMEND PPC1 to encourage low emission land use types.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-6123	Oppose the provision	AMEND PPC1/Schedule B so that it's fair for all farming operations. AND AMEND PPC1 to shift from the grandparenting approach to a fair and measured system. AND AMEND PPC1 to encourage low emission land use types. AND DELETE use of the OVERSEER Model.
Schedule C - Stock exclusion	PC1-6125	Oppose the provision	AMEND Schedule C so fencing requirements are practical and cost effective and based on a benefit cost ratio.

## Watson, David and Sheona

Submitter ID: 73059

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4734	Support the provision with amendments	AMEND PPC1 to add measurable long term goals that are achievable and relevant and supported and implemented by all. AND AMEND PPC1 to adopt a sub-catchment system that ensures there is more buy-in and a better outcome and things are addressed at the relevant level.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-4726	Support the provision with amendments	AMEND Rule 3.11.5.1 so the stocking rate is set at 18 stock units per hectare, this is the same as Auckland and Gisborne. AND CLARIFY how a 15 degrees slope is determined.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-4727	Support the provision with amendments	AMEND Rule 3.11.5.2 so the stocking rate is set at 18 stock units per hectare, this is the same as Auckland and Gisborne. AND CLARIFY how a 15 degrees slope is determined.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-4728	Oppose the provision	REMOVE (rule 3.11.5.3) the Nitrogen Reference Point for PPC1 AND ADOPT a sub-catchment approach addressing all four contaminants equally and specifically for each sub-catchment. Specific requirements can then be translated into farm specific targets addressed within the Farm Environment Plan.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-4731	Support the provision with amendments	REMOVE from Rule 3.11.5.4 the use of the Nitrogen Reference Point and use the Farm Environment Plan to set mitigation for all four contaminants equally and specifically for each sub-catchment. AND AMEND PPC1 so that the Farm Environment Plan can be written by the landowners provided they have support from their sector body.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-4733	Oppose the provision	AMEND Rule 3.11.5.7 and PPC1 so farmers are able to adapt their farming type and system to suit the land while staying within the restraints of their Farm Environment Plan.
Schedule B - Nitrogen Reference Point	PC1-4730	Oppose the provision	REMOVE (Schedule B) the Nitrogen Reference Point for PPC1 AND ADOPT a sub-catchment approach addressing all four contaminants equally and specifically for each sub-catchment. Specific requirements can then be translated into farm specific targets addressed within the Farm Environment Plan. AND REMOVE the use of the Nitrogen Reference Point and use the Farm Environment Plan to set mitigation for all four contaminants equally and specifically for each sub-catchment.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule C - Stock exclusion	PC1-4724	Oppose the provision	AMEND to exclude from Schedule C any areas with slopes exceeding 15 degrees and where no break feeding occurs AND AMEND the process of Farm Environment Plans so Council works with the Farm Plan on each individual farm to achieve the set environmental goals AND AMEND to define a waterway as containing continually moving surface water and exceeding 1 metre wide at any point and 30 cm deep on average.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12558	Oppose the provision with amendments	AMEND Schedule 1 to define a waterway as containing continually moving surface water and exceeding 1 metre wide at any point and 30 cm deep on average.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12559	Support the provision with amendments	Schedule 1 - AMEND the process of Farm Environment Plans so Council works with the Farm Plan on each individual farm to achieve the set environmental goals AND AMEND to ensure Farm Environment Plans set mitigation for all four contaminants equally and specifically for each sub-catchment AND AMEND to ensure Farm Environment Plans can be written by the landowners provided they have support from their sector body.
Schedule 1 - Requirements for Farm Environment Plans	PC1-4725	Oppose the provision with amendments	AMEND Schedule 1 to exclude any areas with slopes exceeding 15 degrees and where no break feeding occurs.

## Weake, Jeffrey Laurence James

Submitter ID: 73450

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-9145	Support the provision	AMEND PPC1 to provide for the eradication of pest fish from waterways prior to landowners paying mitigation costs to reduce sedimentation and microbial pathogens AND AMEND to provide for an independent panel to be used. AND CONSIDER the concerns about the costs of mitigations, sub-catchment approach and the protection of key infrastructure.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-9150	Oppose the provision	AMEND Objective 5 so that all people work together for good water quality.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-9156	Oppose the provision	AMEND Policy 16 so that all people work together for good water quality.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-9157	Oppose the provision	AMEND Policy 17 to provide for pest fish to be eradicated from waterways AND AMEND so that landowner sediment and microbial pathogen mitigations are required after pest fish are eradicated from waterways.
Schedule B - Nitrogen Reference Point	PC1-9148	Oppose the provision	AMEND Schedule B to provide for an effects and science based sub-catchment approach to addressing contaminants that are relevant to each farm and water bodies in that sub-catchment

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND Schedule B/PPC1 to provide for the Nitrogen Reference Point to be used in an information capacity for best practice, not in a regulatory capacity.

## Webber, Richard Mark

Submitter ID: 72829

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4784	Support the provision with amendments	AMEND to address concerns about negative effects, cost and practicality of PPC1 provisions.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-4783	Oppose the provision	AMEND Rule 3.11.5.2 4 c. and Rule 3.11.5.2 4 d. to ensure these activities are permitted as long as they fit within the allocated Nitrogen Reference Point and mitigations are put in place.
Schedule B - Nitrogen Reference Point	PC1-4785	Support the provision with amendments	AMEND Schedule B so that the Nitrogen Reference Point is calculated at a sub-catchment level (not Freshwater Management Unit level).
Schedule 1 - Requirements for Farm Environment Plans	PC1-4789	Support the provision with amendments	No specific relief sought for Schedule 1.

## Welch, Andrew

Submitter ID: 71841

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8017	Oppose the provision with amendments	AMEND as stated in the submission.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-7933	Oppose the provision	AMEND Objective 1 to acknowledge the highly modified nature of the Waikato River environment.
Objective 4: People and community resilience	PC1-7938	Oppose the provision	No specific decision sought for Objective 4.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-7936	Oppose the provision	No specific decision sought for Policy 2.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-7937	Oppose the provision	No specific decision sought for Policy 9.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 10: Provide for point source discharges of regional significance	PC1-7934	Oppose the provision	No specific decision sought for Policy 10.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-7935	Oppose the provision	No specific decision sought for Policy 16.

## Welch, Andrew R and Carmel A

Submitter ID: 73995

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8366	Oppose the provision	No specific decision sought for PPC1.
Schedule B - Nitrogen Reference Point	PC1-8365	Oppose the provision	DELETE Schedule B.
Schedule C - Stock exclusion	PC1-8364	Oppose the provision	DELETE Schedule C.

## Welch, Graham Ronald

Submitter ID: 73994

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8522	Oppose the provision	AMEND PPC1 to specify different sources of E.coli.
Schedule C - Stock exclusion	PC1-8520	Oppose the provision	No specific decision sought for Schedule C.

## Welch, Peter and Jennifer

Submitter ID: 73797

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-5611	Oppose the provision with amendments	AMEND PPC1 to allow farmers to change to dairy without having to gain resource consent. [The submission states support for the Federated Farmers submission.]



# Wellington Farms Ltd

Submitter ID: 71355

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8248	Oppose the provision	REMOVE PPC1 entirely. OR AMEND by placing the plan on hold until the withdrawn area of the plan is reinstated. AMEND PPC1 to clearly set out how it intends to achieve the 80 year outcomes. AND AMEND PPC1 to incorporate towns, cities and businesses that operate in the catchment.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-7157	Support the provision with amendments	RETAIN the intent of Objective 1, AND AMEND by making available the plan beyond PPC1.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-7205	Oppose the provision	DELETE Policy 16.
3.11.4.5 Sub-catchment scale planning	PC1-7195	Support the provision with amendments	AMEND by basing PPC1 on scientific evidence as to what is causing the decline of water quality.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-7181	Support the provision with amendments	AMEND Rule 3.11.5.1 by relating the stocking rate to soil type, land contour and Farm Environmental Plans AND REMOVE the clauses that hold land use to historic stocking rates. AMEND Rule 3.11.5.1 to a guideline for Farm Environment Plans AND AMEND so farms can produce their own Farm Environment Plan with guidance from Council AND DELETE timeframes and instead set through consultation with the farmer taking into account their financial constraints.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-7182	Support the provision with amendments	AMEND Rule 3.11.5.2 by relating the stocking rate to soil type, land contour and Farm Environmental Plans. AND REMOVE the clauses that hold land use to historic stocking rates. AMEND Rule 3.11.5.2 provisions relating to the discharge of nitrogen, phosphorus, sediment and pathogens by relating the rule to the soil type and land contour AND AMEND to a catchment based approach, not a blanket rule for all farms. REMOVE the Nitrogen Reference Point and use of the OVERSEER Model from PPC1 completely AND AMEND Rule 3.11.5.2 by relating it to the capability of the land and the Farm Environment Plan AND AMEND by using science to determine what would work best on each farm. AMEND Rule 3.11.5.2 by subsidising any waterway fencing, riparian planting and water reticulation needs. AND AMEND by upholding a minimum standard of fencing. AND AMEND by clearly defining a permanent flowing waterway AND AMEND by using the National Water Policy Statement requirements for stock exclusion AND AMEND by having no fencing over 15 degrees AND AMEND by having a 30 year timeframe.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AMEND Rule 3.11.5.2 by reducing the 3 metre setback to 1 metre.  REMOVE Clause 4 c) completely  OR AMEND by changing the gradient to 60 degrees.  AND AMEND so cultivation is allowed up to the fence lines.  AMEND Rule 3.11.5.2 to a guideline for Farm Environment Plans  AND AMEND so farms can produce their own Farm Environment Plan with guidance from a Council  AND REMOVE timeframes and instead set through consultation with the farmer taking into account their financial constraints.  AMEND Rule 3.11.5.2 so that farmers are not forced to provide information to their Regional Council.</p>
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-7200	Support the provision with amendments	<p>AMEND Rule 3.11.5.3 to a guideline.  AND AMEND so farms can produce their own Farm Environment Plan with guidance from a Council.  AND REMOVE timeframes and instead set through consultation with the farmer taking into account their financial constraints.</p>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-7201	Support the provision with amendments	<p>AMEND Rule 3.11.5.4 to a guideline.  AND AMEND so farms can produce their own Farm Environment Plan with guidance from a Council.  AND REMOVE timeframes and instead set through consultation with the farmer taking into account their financial constraints.</p>
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-7202	Support the provision with amendments	<p>AMEND Rule 3.11.5.5 to a guideline, not a rule.  AND AMEND so farms can produce their own Farm Environment Plan with guidance from a Council.  AND REMOVE timeframes and instead set through consultation with the farmer taking into account their financial constraints.</p>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-7203	Support the provision with amendments	<p>AMEND Rule 3.11.5.6 so farms can produce their own Farm Environment Plan with guidance from a Council.  AND REMOVE timeframes and instead set through consultation with the farmer taking into account their financial constraints.</p>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13129	Support the provision with amendments	<p>AMEND Rule 3.11.5.6 to a guideline, not a rule.</p>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-7192	Oppose the provision with amendments	<p>DELETE Rule 3.11.5.7 entirely and relate it to the capability of the land and the Farm Environment Plan.  AND AMEND Rule 3.11.5.7 to a guideline.  AND AMEND so farms can produce their own Farm Environment Plan with guidance from a Council.  AND REMOVE timeframes and instead set through consultation with the farmer taking into account their financial constraints.  AND MAKE any other consequential amendments.</p>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-7180	Support the provision with amendments	<p>AMEND Table 3.11-1 so that the water quality targets are achievable.  AND AMEND by making available the plan beyond PPC1.</p>

## Welsh, Mikayla

Submitter ID: 74184

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6150	Oppose the provision	WITHDRAW PPC1 until the Waikato Regional Council can treat the whole of its catchment as one.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-6101	Oppose the provision	WITHDRAW PPC1 and replace it with objectives including numerical water quality limits/targets that consider the reality of the Waikato, and are achievable, provide for the protection of its life supporting capacity, while also ensuring that the health and well-being including social and economic values of people and communities are safeguarded.
3.11.4.3 Farm Environment Plans	PC1-6157	Support the provision with amendments	AMEND Method 3.11.4.3 by allowing farmers to either hire the services of a certified Farm Environment Planner or write the Farm Environment Plan themselves, as long as it complies with the minimum requirements set by the Waikato Regional Council.
3.11.4.10 Accounting system and monitoring	PC1-6155	Oppose the provision with amendments	AMEND 3.11.4.10 by removing any council established and publicly available accounting system in each Freshwater Management Unit until the data required becomes available. AND AMEND to ensure that before any monitoring plan is devised first have a strong understanding of the current situation and contributors in their entirety.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-6137	Oppose the provision with amendments	DELETE provisions in PPC1 that relate to excluding cattle from waterbodies through permanent fencing. AND AMEND Rule 3.11.5.1 by addressing actual risk, targeting critical source areas, tailored farm specific critical source management, targeted riparian planting and stock management approaches. AND AMEND by allowing the ability to muster cattle through waterbodies without requiring formed stock crossing structure when crossing less than three times weekly. AND MAKE any other consequential amendments.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-6140	Oppose the provision with amendments	Stock Exclusion DELETE provisions in PPC1 that relate to excluding cattle from waterbodies through permanent fencing. AND AMEND Rule 3.11.5.2 by addressing actual risk, targeting critical source areas, tailored farm specific critical source management, targeted riparian planting and stock management approaches. AND AMEND by allowing the ability to muster cattle through waterbodies without requiring formed stock crossing structure when crossing less than three times weekly. AND MAKE any other consequential amendments. Slope for cultivation and grazing AMEND Rule 3.11.5.2 (4)(c) and (d) by removing the degree of slope for both cultivation and grazing and replace with thresholds relevant to the intensity of farming. AND AMEND by removing the restriction of grazing winter forage crops in situ.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-6143	Oppose the provision with amendments	Stock Exclusion DELETE provisions in PPC1 that relate to excluding cattle from waterbodies through permanent fencing.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND Rule 3.11.5.3 by addressing actual risk, targeting critical source areas, tailored farm specific critical source management, targeted riparian planting and stock management approaches.</p> <p>AND AMEND by allowing the ability to muster cattle through waterbodies without requiring formed stock crossing structure when crossing less than three times weekly.</p> <p>AND MAKE any other consequential amendments.</p> <p>Nitrogen Reference Point</p> <p>AMEND Rule 3.11.5.3 by removing the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point.</p>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-6154	Oppose the provision with amendments	AMEND Rule 3.11.5.4 by removing the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-6149	Oppose the provision with amendments	<p>DELETE provisions in PPC1 that relate to excluding cattle from waterbodies through permanent fencing</p> <p>AND AMEND Rule 3.11.5.6 by addressing actual risk, targeting critical source areas, tailored farm specific critical source management, targeted riparian planting and stock management approaches</p> <p>AND AMEND by allowing the ability to muster cattle through waterbodies without requiring formed stock crossing structure when crossing less than three times weekly</p> <p>AND MAKE any other consequential amendments.</p>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-6153	Oppose the provision with amendments	AMEND Rule 3.11.5.7 by removing the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point.
Schedule B - Nitrogen Reference Point	PC1-6151	Oppose the provision with amendments	AMEND Schedule B by removing the requirement for extensive operations (at or under 18 stock units) and sheep and beef farmers to have to manage to a Nitrogen Reference Point.
Schedule C - Stock exclusion	PC1-6134	Oppose the provision with amendments	<p>DELETE provisions in PPC1 that relate to excluding cattle from waterbodies through permanent fencing.</p> <p>AND AMEND Schedule C by addressing actual risk, targeting critical source areas, tailored farm specific critical source management, targeted riparian planting and stock management approaches.</p> <p>AND AMEND by allowing the ability to muster cattle through waterbodies without requiring formed stock crossing structure when crossing less than three times weekly.</p> <p>AND AMEND Schedule C (5)(i), (ii), (iii) and (iv) to clarify the definition of waterbody.</p> <p>AND MAKE any other consequential amendments.</p>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-6104	Oppose the provision	WITHDRAW PPC1 and replace it with objectives including numerical water quality limits/targets that consider the reality of the Waikato, and are achievable, provide for the protection of its life supporting capacity, while also ensuring that the health and well-being including social and economic values of people and communities are safeguarded.

## Whaingaroa Harbour Care

Submitter ID: 60735

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8037	Support the provision with amendments	AMEND PPC1 to ensure landowners erect fences so that riparian areas can be planted to absorb sediment and nutrient run-off. AND AMEND to provide moratorium on new conversions of land to dairy farms until water quality is improved and streams are swimmable.

## White Pine Dairies Ltd

Submitter ID: 73277

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-11036	Oppose the provision	AMEND all references to stock numbers/ha to change to live weight/ha. AMEND PPC1 to consider the financial implications associated with the plan change.
Policy 6: Restricting land use change	PC1-11033	Oppose the provision	No specific relief sought for Policy 6.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-11032	Oppose the provision	AMEND Policy 9 to provide for a sub-catchment approach.
Schedule B - Nitrogen Reference Point	PC1-11034	Oppose the provision	DELETE from Schedule B the use of Nitrogen Reference Points AND DELETE the methodology of the grandparenting of nutrients AND provide an alternative tool to the OVERSEER Model.
Schedule C - Stock exclusion	PC1-11035	Oppose the provision with amendments	No specific relief sought for Schedule C.

## Wilcock, Grace Margaret and Roger David

Submitter ID: 74193

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7647	Oppose the provision with amendments	PUT ON HOLD this process until consultation has been finalised AMEND PPC1 by fencing only some areas such as springs that are a source of potable water be fenced and no human access is allowed.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-7628	Oppose the provision	No specific decision sought for Rule 3.11.5.1.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-7631	Support the provision with amendments	AMEND Rule 3.11.5.2 by using a maximum stock number per year. AND AMEND the land area from 4.1ha to 20ha. AND AMEND Rule 3.11.5.2 to ensure that stocking units are only provided if they change significantly above permitted Stock Unit levels; this would be established at registration or from Nait database.
Schedule A - Registration with Waikato Regional Council	PC1-7618	Support the provision with amendments	AMEND Schedule A by using the Nait Number for details of cattle numbers. AND AMEND by asking for maximum numbers rather than land activity under Clause 5d.

## Wilcox, Alexander Greer and Glen Andrew

Submitter ID: 73026

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6895	Support the provision with amendments	REINSTATE Objective 6 (Withdrawn) as originally proposed AND AMEND to REINSTATE Policy 15 (withdrawn) AND AMEND Policy 15 (withdrawn) to be holistic and include all factors influencing the health and well-being of the Waikato River and its catchments especially pest fish species, in relation to sub-catchment management. AND MAKE any consequential amendments including to the objectives, policies and rules or restructuring to give effect to the relief sought. AND WITHDRAW PPC1 until provisions for the north eastern portion of the catchment are amended and the Vision and Strategy review completed and a new section 32 analysis undertaken which investigates the revised impact of PPC1 on society and the economy.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-6889	Support the provision with amendments	RETAIN the long-term restoration and protection of water quality for the Waikato and Waipā Rivers in Objective 1. AND AMEND PPC1 to be holistic and include all factors influencing the health and well-being of the Waikato River and its catchments e.g. Koi Carp, point source discharges and hydro dams. AND AMEND to address contaminants on a sub-catchment basis, to enable targeting of the highest discharging sub-catchments. AND DELETE from Table 3.11.1 the flood/high flow conditions from water quality target data.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-6890	Support the provision with amendments	RETAIN Objective 2 the maintenance of long-term social, economic and cultural well-being in the Waikato and Waipā catchment communities. AND WITHDRAW PPC1 until the north eastern portion [Hauraki Iwi area] and the WRA's Vision and Strategy has been amended AND ENSURE a Section 32 analysis of the impact PPC1 on society and the economy is completed. AND AMEND Rules to remove the Nitrogen Reference Point. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored Farm Environment Plan AND AMEND to address contaminants on a sub-catchment basis, to enable targeting of the highest discharging sub-catchments

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to develop robust indicators to measure social, economic and cultural well-being.
Objective 3: 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	PC1-6892	Support the provision with amendments	RETAIN Objective 3's aim to achieve 10% of the long-term water quality targets set out in PPC1 by 2026 AND AMEND the Rules to remove the Nitrogen Reference Point AND AMEND to adopt a sub-catchment approach to ensure collaborative and fair management of resources within each sub-catchment AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.
Objective 4: People and community resilience	PC1-6894	Support the provision with amendments	RETAIN in Objective 4 the staged approach to change. AND AMEND the rules in PPC1 to remove Nitrogen Reference Point and land use change restriction. AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12668	Support the provision with amendments	AMEND Policy 1 to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12669	Support the provision with amendments	RETAIN Policy 1 regarding managing diffuse discharges and water quality on a sub-catchment basis.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12670	Support the provision with amendments	Policy 1 - CLARIFY how slope is measured, given the ranges of topography experiences within each paddock and adjoining watercourses.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-6898	Support the provision with amendments	AMEND the Rules in PPC1 to reflect Policies 1 and 9.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12966	Oppose the provision with amendments	AMEND PPC1 to remove the Nitrogen Reference Point from the rules.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12967	Support the provision with amendments	AMEND PPC1 to reflect Policy 1 in adopting a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-6899	Support the provision with amendments	RETAIN Policy 2's support for appropriate mitigation strategies to be adopted in the context of water quality gains, through a tailored Farm Environment Plan.
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-6900	Support the provision with amendments	RETAIN Policy 3's flexibility to undertake crop rotations. AND RETAIN appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored Farm Environment Plan.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND PPC1 to reflect Policy 1 in adopting a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. AND AMEND to the rules to remove the use of a Nitrogen Reference Point. AND AMEND PPC1 to remove reference to the capping of land for commercial vegetable production.
Policy 5: Staged approach	PC1-6903	Support the provision with amendments	RETAIN the Policy 5 staged approach. AND AMEND the rules in PPC1 to remove Nitrogen Reference Point. AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains, through a tailored Farm Environment Plan.
Policy 6: Restricting land use change	PC1-6904	Oppose the provision	AMEND Policy 6 to support land use change being a restricted discretionary activity for high priority water quality sub-catchments and a permitted activity for low priority water quality sub-catchments. AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.
Policy 8: Prioritised implementation	PC1-6905	Support the provision	RETAIN Policy 8 prioritising sub-catchment and staged implementation. AND AMEND PPC1 to reflect the flexibility commercial vegetable producers need to effectively and efficiently manage resources across a number of sub-catchments.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-6906	Support the provision with amendments	RETAIN Policy 9 managing water quality at a sub-catchment level. Policy 9: AMEND the rules to reflect Policy 1 and 9. AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.
Policy 14: Lakes Freshwater Management Units	PC1-6911	Support the provision	RETAIN Policy 14 as proposed.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-6912	Support the provision with amendments	RETAIN the use of a tailored, risk based Farm Environment Plan to reduce diffuse discharges. AND AMEND Rule 3.11.5.5 so that the resources consent duration provides future certainty for commercial vegetable growers. AND AMEND Rule 3.11.5.5 to remove commercial vegetable production capping of land and instead reflect management of land use on a sub-catchment basis. AND AMEND to clarify as to how land will be moved and retired within the catchment under a resource consent. AND AMEND to clarify how the Nitrogen Reference Point applies to leased land. AND AMEND to clarify whether retired land will be allocated a residual Nitrogen Reference Point.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-6913	Oppose the provision	AMEND Rule 3.11.5.7 to address contaminants on a sub-catchment basis to target sub-catchments discharging the highest contaminant levels AND AMEND the activity status of land use change provisions from non-complying to a restricted discretionary activity for high priority water quality sub-catchments, and limit discretion to the management of the diffuse discharges of the four contaminants



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to activity status of land use change provisions to a permitted activity for low priority water quality sub-catchments AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains through a tailored Farm Environment Plan.

## Wilde, Tracy

Submitter ID: 71241

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-613	Support the provision with amendments	AMEND Rule 3.11.2.5 the provision to exclude horses kept as part of a small business or for recreation if the land is less than 20 hectares; Or AMEND the provision so that stocking rates for horses may exceed the base rate by 20% for 50% of a year

## Wilding, Anthony Gordon

Submitter ID: 73501

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8791	Support the provision with amendments	CONSIDER the concerns (impact on rural communities, the costs and practicality of provisions and adequacy of the science and monitoring) raised in the submission. AND RETAIN the overall timeframe and staging of PPC1
Schedule B - Nitrogen Reference Point	PC1-8790	Oppose the provision with amendments	AMEND Schedule B f. the reference period years to 2011/2012, 2012/2013, 2013/2014, 2014/2015 and 2015/2016. AND AMEND to develop in PPC1 through collaboration between industry and compliance bodies a sound and agreed scientific reference points for monitoring. AND substantiate the OVERSEER Model calculation or other measuring tools with physical field monitoring on reference farms in each catchment. AND AMEND Schedule B to provide some compliance leniency in recognition of farmers with a low Nitrogen Reference Points. AND CONSIDER setting a target Nitrogen Reference Point for each sub-catchment and a desire to have all land users to that level in the longer term.
Schedule C - Stock exclusion	PC1-8788	Oppose the provision with amendments	No specific decision sought for Schedule C.
Schedule 1 - Requirements for Farm Environment Plans	PC1-8779	Support the provision with amendments	AMEND Schedule 1 so that industry work with Council to develop an industry Farm Environment Plan which can then be customised to each farm

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND so that Farm Environment Plans can be industry monitored with an independent audit as a cross check and the frequency of audit lessens once compliance or an agreed standard is achieved</p> <p>AND develop a sound and agreed scientific reference point for Farm Environment Plan monitoring through collaboration between industry and compliance bodies</p> <p>AND substantiate the OVERSEER Model calculation or other measuring tools using monitoring farms in each catchment.</p>

## Wildman, Anna Mary

Submitter ID: 72505

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-3857	Oppose the provision	PLACE PPC1 ON HOLD until consultation with the Hauraki iwi authorities is completed.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-3856	Support the provision	No specific decision sought for Objective 1.
Objective 4: People and community resilience	PC1-3858	Support the provision with amendments	<p>AMEND Objective 4 so that more work is undertaken on the costs to farmers of implementing PPC1, and the impact it will have on people and community resilience, and provide what will be required in future years.</p> <p>AND DELETE Objective 4(b).</p>
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-3880	Support the provision with amendments	<p>AMEND Policy 1 so that the stock exclusion provisions on rolling to steeper country up to a 15 degree slope only waterways over 1 metre wide at any point are required to be fenced in line with the governments clean water report released in February 2017</p> <p>AND AMEND to provide for funding to be made available to support farmers in fencing off larger waterways and riparian planting</p> <p>AND AMEND to provide for managing stock across a waterway without a crossing structure if the number of crossings are limited to X crossings per week</p> <p>AND AMEND to recognise that the fencing requirements on some properties will be impossible to comply with within the timeframes set and provide flexibility to manage the timescales through Farm Environment Plans and in line with the governments February 2017 water quality standards.</p>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-3874	Oppose the provision	<p>DELETE from Policy 2 the Nitrogen Reference Point AND REPLACE with the use of Farm Environment Plans as the primary tool to manage nutrient losses. Nitrogen Reference Points should be used to support the Farm Environment Plans and farms with high emission should still be required to reduce their nutrient losses</p> <p>AND more work should be done on addressing contaminant loss through a sub-catchment approach including increased use of technology and water monitoring to support the identification of sub-catchment issues.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12968	Support the provision with amendments	Policy 2 - AMEND the stock exclusion provisions on rolling to steeper country up to a 15 degree slope only waterways over 1 metre wide at any point are required to be fenced in line with the governments clean water report released in February 2017 AND provide for funding to be made available to support farmers in fencing off larger waterways and riparian planting AND AMEND to provide for managing stock across a waterway without a crossing structure if the number of crossings are limited to X crossings per week AND AMEND to recognise that the fencing requirements on some properties will be impossible to comply with within the timeframes set and provide flexibility to manage the timescales through Farm Environment Plans and in line with the governments February 2017 water quality standards.
Policy 6: Restricting land use change	PC1-3893	Oppose the provision	DELETE Policy 6 AND REPLACE with provisions for land use changes to be controlled and managed through a Farm Environment Plan to ensure best practice in mitigating contaminant loss and other factors affecting waterways. AND AMEND so that the consent process is not just subject to whether the Nitrogen Reference Point will increase as nitrate losses. AND DELETE the Nitrogen Reference Point AND REPLACE with the use of Farm Environment Plans as the primary tool to manage nutrient losses in line with the sub-catchment approach. Nitrogen Reference Points should be used to support the Farm Environment Plans and farms with high emission should still be required to reduce their nutrient losses. AND more work should be done on addressing contaminant loss through a sub-catchment approach including increased use of technology and water monitoring to support the identification of sub-catchment issues.
Policy 7: Preparing for allocation in the future	PC1-3875	Oppose the provision	DELETE from Policy 7 the Nitrogen Reference Point AND REPLACE with the use of Farm Environment Plans as the primary tool to manage nutrient losses. Nitrogen Reference Points should be used to support the Farm Environment Plans and farms with high emission should still be required to reduce their nutrient losses AND more work should be done on addressing contaminant loss through a sub-catchment approach including increased use of technology and water monitoring to support the identification of sub-catchment issues.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-3899	Support the provision with amendments	AMEND Policy 9 to undertake further work at a sub-catchment level to determine the specific water quality issues affecting each area AND AMEND so that Farm Environment Plans are used to tackle the specific issues relevant to the catchment.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-3861	Oppose the provision	DELETE Policy 16.
3.11.4.3 Farm Environment Plans	PC1-3864	Support the provision with amendments	AMEND Method 3.11.4.3 so that Farm Environment Plans define how the farm manages environmental quality, rather than the use of blanket rules AND ENSURE that the cost of producing a Farm Environment Plan through a certified planner is not prohibitive and supported by the council

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND the timescales for completion of Farm Environment Plans to be realistic with adequate certified planners in place.
3.11.4.5 Sub-catchment scale planning	PC1-3897	Support the provision with amendments	AMEND Method 3.11.4.5 to undertake further work at a sub-catchment level to determine the specific water quality issues affecting each area, AND AMEND so that Farm Environment Plans are used to tackle the specific issues relevant to the catchment.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-3882	Support the provision with amendments	AMEND Rule 3.11.5.1 the stock exclusion provisions on rolling to steeper country up to a 15 degree slope only waterways over 1 metre wide at any point are required to be fenced in line with the governments clean water report released in February 2017 AND provide for funding to be made available to support farmers in fencing off larger waterways and riparian planting AND AMEND to provide for managing stock across a waterway without a crossing structure if the number of crossings are limited to X crossings per week AND AMEND to recognise that the fencing requirements on some properties will be impossible to comply with within the timeframes set and provide flexibility to manage the timescales through Farm Environment Plans and in line with the governments February 2017 water quality standards.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-3888	Oppose the provision	DELETE from Rule 3.11.5.2 the Nitrogen Reference Point AND REPLACE with the use of Farm Environment Plans as the primary tool to manage nutrient losses. Nitrogen Reference Points should be used to support the Farm Environment Plans and farms with high emission should still be required to reduce their nutrient losses AND more work should be done on addressing contaminant loss through a sub-catchment approach including increased use of technology and water monitoring to support the identification of sub-catchment issues AND AMEND the stock exclusion provisions on rolling to steeper country up to a 15 degree slope only waterways over 1 metre wide at any point are required to be fenced in line with the governments clean water report released in February 2017 AND provide for funding to be made available to support farmers in fencing off larger waterways and riparian planting AND AMEND to provide for managing stock across a waterway without a crossing structure if the number of crossings are limited to X crossings per week AND AMEND to recognise that the fencing requirements on some properties will be impossible to comply with within the timeframes set and provide flexibility to manage the timescales through Farm Environment Plans and in line with the governments February 2017 water quality standards.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-3890	Oppose the provision	AMEND Rule 3.11.5.3 so that Farm Environment Plans define how the farm manages environmental quality, rather than the use of blanket rules and ensure that the cost of producing a Farm Environment Plan through a certified planner is not prohibitive and supported by the council AND AMEND the timescales for completion of Farm Environment Plans to be realistic with adequate certified planners in place AND DELETE the Nitrogen Reference Point is opposed as it: rewards high emitters enabling them to remain flexible and develop their business, when they should have to reduce their emissions; low production farms are penalised with no ability to change to meet the market; it is being applied to all farms regardless of whether it is an issue for their catchment

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND more work should be done on addressing contaminant loss through a sub-catchment approach including increased use of technology and water monitoring to support the identification of sub-catchment issues</p> <p>AND AMEND the stock exclusion provisions on rolling to steeper country up to a 15 degree slope only waterways over 1 metre wide at any point are required to be fenced in line with the governments clean water report released in February 2017</p> <p>AND provide for funding to be made available to support farmers in fencing off larger waterways and riparian planting</p> <p>AND AMEND to provide for managing stock across a waterway without a crossing structure if the number of crossings are limited to X crossings per week</p> <p>AND AMEND to recognise that the fencing requirements on some properties will be impossible to comply with within the timeframes set and provide flexibility to manage the timescales through Farm Environment Plans and in line with the governments February 2017 water quality standards.</p>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-3889	Oppose the provision	<p>DELETE from Rule 3.11.5.4 the Nitrogen Reference Point is opposed as it: rewards high emitters enabling them to remain flexible and develop their business, when they should have to reduce their emissions; low production farms are penalised with no ability to change to meet the market; it is being applied to all farms regardless of whether it is an issue for their catchment</p> <p>AND more work should be done on addressing contaminant loss through a sub-catchment approach including increased use of technology and water monitoring to support the identification of sub-catchment issues</p> <p>AND AMEND the stock exclusion provisions on rolling to steeper country up to a 15 degree slope only waterways over 1 metre wide at any point are required to be fenced in line with the governments clean water report released in February 2017</p> <p>AND provide for funding to be made available to support farmers in fencing off larger waterways and riparian planting</p> <p>AND AMEND to provide for managing stock across a waterway without a crossing structure if the number of crossings are limited to X crossings per week</p> <p>AND AMEND to recognise that the fencing requirements on some properties will be impossible to comply with within the timeframes set and provide flexibility to manage the timescales through Farm Environment Plans and in line with the governments February 2017 water quality standards.</p>
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-3876	Oppose the provision	<p>DELETE from Rule 3.11.5.5 the Nitrogen Reference Point the Nitrogen Reference Point AND REPLACE with the use of Farm Environment Plans as the primary tool to manage nutrient losses. Nitrogen Reference Points should be used to support the Farm Environment Plans and farms with high emission should still be required to reduce their nutrient losses</p> <p>AND more work should be done on addressing contaminant loss through a sub-catchment approach including increased use of technology and water monitoring to support the identification of sub-catchment issues.</p>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-3877	Oppose the provision	<p>DELETE from Rule 3.11.5.6 the Nitrogen Reference Point the Nitrogen Reference Point AND REPLACE with the use of Farm Environment Plans as the primary tool to manage nutrient losses. Nitrogen Reference Points should be used to support the Farm Environment Plans and farms with high emission should still be required to reduce their nutrient losses.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13130	Oppose the provision	Rule 3.11.5.6 - more work should be done on addressing contaminant loss through a sub-catchment approach including increased use of technology and water monitoring to support the identification of sub-catchment issues.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-3895	Oppose the provision	DELETE Rule 3.11.5.7 AND REPLACE with provisions for land use changes to be controlled and managed through a Farm Environment Plan to ensure best practice in mitigating contaminant loss and other factors affecting waterways. AND AMEND so that the consent process is not just subject to whether the Nitrogen Reference Point will increase. AND DELETE the Nitrogen Reference Point AND REPLACE with the use of Farm Environment Plans as the primary tool to manage nutrient losses. Nitrogen Reference Points should be used to support the Farm Environment Plans and farms with high emission should still be required to reduce their nutrient losses. AND more work should be done on addressing contaminant loss through a sub-catchment approach including increased use of technology and water monitoring to support the identification of sub-catchment issues.
Schedule B - Nitrogen Reference Point	PC1-3878	Oppose the provision	DELETE Schedule B the Nitrogen Reference Point the Nitrogen Reference Point AND REPLACE with the use of Farm Environment Plans as the primary tool to manage nutrient losses. Nitrogen Reference Points should be used to support the Farm Environment Plans and farms with high emission should still be required to reduce their nutrient losses. AND more work should be done on addressing contaminant loss through a sub-catchment approach including increased use of technology and water monitoring to support the identification of sub-catchment issues.
Schedule C - Stock exclusion	PC1-3883	Support the provision with amendments	AMEND Schedule C the stock exclusion provisions on rolling to steeper country up to a 15 degree slope only waterways over 1 metre wide at any point are required to be fenced in line with the governments clean water report released in February 2017. AND provide for funding to be made available to support farmers in fencing off larger waterways and riparian planting. AND AMEND to provide for managing stock across a waterway without a crossing structure if the number of crossings are limited to X crossings per week. AND AMEND to recognise that the fencing requirements on some properties will be impossible to comply with within the timeframes set and provide flexibility to manage the timescales through Farm Environment Plans and in line with the governments February 2017 water quality standards.
Schedule 1 - Requirements for Farm Environment Plans	PC1-3891	Support the provision with amendments	AMEND Schedule 1 so that Farm Environment Plans define how the farm manages environmental quality, rather than the use of blanket rules. And ensure that the cost of producing a Farm Environment Plan through a certified planner is not prohibitive and supported by the council AND AMEND the timescales for completion of Farm Environment Plans to be realistic with adequate certified planners in place.
Schedule 2 - Certification of Industry Schemes	PC1-3892	Support the provision with amendments	AMEND Schedule 2 so that Farm Environment Plans define how the farm manages environmental quality, rather than the use of blanket rules. And ensure that the cost of producing a Farm Environment Plan through a certified planner is not prohibitive and supported by the council AND AMEND the timescales for completion of Farm Environment Plans to be realistic with adequate certified planners in place.

## Wilkins, Jean

Submitter ID: 73523

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8630	Oppose the provision with amendments	AMEND to include provision for the control and eradication of Koi carp. AND AMEND so that as a country we work together and share responsibility/financial burden for a healthy Waikato River and all New Zealand Rivers. AND CONSIDER the effect of PPC1 on farmer livelihood and the economy, and when people want to swim in the Waikato River, and the contribution of waterfowl to E.coli levels.
Use values - Electricity generation	PC1-8598	Not stated	No specific decision sought for 'Use values - Electricity generation', but the submission notes that as a country we need to work together for a healthy Waikato River and all New Zealand Rivers.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-8624	Oppose the provision	CONSIDER for Rule 3.11.5.2. 4 (c) the concerns raised in the submission (weeds, land will not be improved, land prices and effect of farming towns and communities) about no cultivation of over slopes of 15 degrees
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-8626	Oppose the provision	REMOVE Rule 3.11.5.4. 5 (a) /PPC1 requirement to complete or pay some to complete an additional Farm Environment Plan AND AMEND Rule 3.11.5.4. 5 (a) / PPC1 requirement to working together with Fonterra (and similar) and its farmers share Farm Environmental Plan content information with Waikato Regional Council AND AMEND Rule 3.11.5.4. 5 (c) to clarify whether a farm with a high Nitrogen Reference Point is permitted to remain high in future years AND AMEND Rule 3.11.5.4. 5 (c) to set a five year [reference period] timeframe for calculating the Nitrogen Reference Point AND undertake Rule 3.11.5.4.5 (d) further investigation into areas where fencing is impractical or impossible e.g. steep hill country AND AMEND Rule 3.11.5.4.5 (d) to exclude stock from water bodies which include the sea.

## Williams, Annette Judith

Submitter ID: 72486

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-8549	Support the provision with amendments	AMEND Policy 2 to modify timeframes to enable flexibility and the development of advisors AND AMEND to allow staged completion of Farm Environment Plans AND AMEND to allow farmers to produce Farm Environment Plans, with managed industry support.
Schedule 1 - Requirements for Farm Environment Plans	PC1-8550	Support the provision with amendments	AMEND Schedule 1 to modify timeframes to enable flexibility and the development of advisors AND AMEND to allow staged completion of Farm Environment Plans AND AMEND to allow farmers to produce Farm Environment Plans, with managed industry support.

## Williams, Ian David

Submitter ID: 71432

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 6: Restricting land use change	PC1-763	Oppose the provision	DELETE Rule 3.11.5.7 (Policy 6) AND REPLACE Rule 3.11.5.7 with a rule that enables land use change to occur with reference to established sub-catchment limits. AND ADD a provision to make Land-use change for farming activities with contaminant losses below the catchment limit a permitted activity so long as contaminant losses do not exceed the sub-catchment limit. AND ADD a provision to make Land-use changes for farming activities with contaminant losses above the sub-catchment limit a consented activity.
3.11.4 Implementation methods	PC1-797	Oppose the provision with amendments	ADD a NEW Method to develop sub-catchment limits based on the scientific measurement and monitoring of contaminant levels within the sub-catchment waterways in such a way that farms in the catchment with Nitrogen Reference Points greater than the sub-catchment limit must endeavour to reduce their contaminant losses over time. And farms with a Nitrogen Reference Point below a certain level (e.g. 20kgsN/ha) should not have to do anything more.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-682	Support the provision with amendments	AMEND Rule 3.11.5.2 4 clause b(ii) to 15/kgN/ha.yr, AMEND Rule 3.11.5.2 4 clause c to contaminants from cultivation and grazing are managed and minimised, AND DELETE 4.e.i as this will be covered by the suggested amendment above.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-684	Support the provision with amendments	AMEND Rule 3.11.5.4 to a Nitrogen Reference Point that is produced according to the following timeframes: - All farms above 20 ha in Priority 1 catchments December 31, 2020 - All farms above 20 ha in Priority 2 catchments December 31, 2023 - All other properties 1 January 2026
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-762	Oppose the provision	DELETE Rule 3.11.5.7 AND REPLACE Rule 3.11.5.7 with a rule that enables land use change to occur with reference to established sub-catchment limits. AND ADD a provision to make Land-use change for farming activities with contaminant losses below the catchment limit a permitted activity so long as contaminant losses do not exceed the sub-catchment limit. AND ADD a provision to make Land-use changes for farming activities with contaminant losses above the sub-catchment limit a consented activity.
Schedule B - Nitrogen Reference Point	PC1-685	Oppose the provision with amendments	AMEND Schedule B to a Nitrogen Reference Point that is produced according to the following timeframes: - All farms above 20 ha in Priority 1 catchments December 31, 2020 - All farms above 20 ha in Priority 2 catchments December 31, 2023 - All other properties 1 January 2026



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AMEND Schedule B to provide for an extension of the timeframes for the development of Nitrogen Reference Points for mixed arable systems until the development work for the OVERSEER crop module is completed AND AMEND Schedule B to address the inequities that high and low Nitrogen Reference Point numbers will have on land values.
Schedule C - Stock exclusion	PC1-764	Support the provision	RETAIN Schedule C.
Schedule 1 - Requirements for Farm Environment Plans	PC1-798	Oppose the provision with amendments	AMEND Schedule 1 to provide for farmers being able to develop their own Farm Environment Plans either on their own accord or through Farm Environment Plan development workshops and having these plans reviewed (including a farm visit to assess the identified risks and planned mitigation measures) by a Certified Farm Environment Planner.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12560	Oppose the provision with amendments	DELETE Schedule 1 2.(f)(i) AND ADD a NEW Schedule 1 2.(f) to read: "(f) A description of cultivation management, including: (i) <del>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</del> (ii) How the adverse effects of cultivation on slopes of less than 15° will be mitigated 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 <del>(minimum 5m setback)</del> ". AND AMEND Schedule 1 2(b)(iii) to read: "(iii) The provision of <del>minimum</del> cultivation setbacks of <u>5 metres designed to mitigate the environmental risk of contaminant losses.</u> " AND AMEND Schedule 1 2(f)(ii)(d) to read: "maintaining appropriate buffers between cultivated areas and water bodies <del>(minimum 5m setback).</del> "
Schedule 1 - Requirements for Farm Environment Plans	PC1-12561	Oppose the provision with amendments	AMEND the numbering of Schedule 1 "2.(f)(ii)(e)" to read " <u>3 (a)</u> " and "2.(f)(ii)(f)" to read " <u>3 (b)</u> " AND AMEND consequent numbering for Schedule 1.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12562	Oppose the provision with amendments	AMEND Schedule 1 to a Nitrogen Reference Point that is produced according to the following timeframes: - All farms above 20 ha in Priority 1 catchments December 31, 2020 - All farms above 20 ha in Priority 2 catchments December 31, 2023 - All other properties 1 January 2026.

## Williams, James Barry

Submitter ID: 71659

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7373	Oppose the provision	AMEND to ensure that catchment areas are broken down into individual areas to recognise that different areas have different needs based on land use, soil type etc.

## Williams, Janet Beverley

Submitter ID: 72487

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule 1 - Requirements for Farm Environment Plans	PC1-4479	Oppose the provision	DELETE Schedule 1(5).

## Williams, Leslie Brian

Submitter ID: 73576

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-11125	Oppose the provision	No specific decision was requested for PPC1.

## Williams, Michael Aitken Harper

Submitter ID: 73948

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5 Rules	PC1-3246	Oppose the provision	DELETE (Rules 3.11.5) the limits set by a Nitrogen Reference Point B and REPLACE with a provision where every farm is dealt with on an individual basis. Each farmer involved should sit down with the Waikato Regional Council and individually tailor a solution that suits both parties. REPLACE the stock exclusion provisions with a provision where every farm is dealt with on an individual basis.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-3247	Oppose the provision	AMEND Rule 3.11.5.7 so that every farm is dealt with on an individual basis on its merits.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-3230	Oppose the provision	AMEND Schedule B so that every farm is dealt with on an individual basis. Each farmer involved should sit down with the Waikato Regional Council and individually tailor a solution that suits both parties.
Schedule C - Stock exclusion	PC1-3229	Oppose the provision	AMEND Schedule C so that every farm is dealt with on an individual basis.

## Williams, Sam Joseph

Submitter ID: 74198

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-5958	Support the provision with amendments	AMEND Schedule B to extend the period for calculating the Nitrogen Reference Point to 6 seasons (2010/11, 2011/12, 2012/13, 2013/14, 2014/15, 2015/16).
Definition - Certified Farm Nutrient Advisor	PC1-5959	Support the provision with amendments	AMEND clause a. of the Definition of Certified Farm Nutrient Advisor to read "Has completed nutrient management training to at least <u>intermediate advanced</u> level..." AND AMEND to ensure a Certified Farm Nutrient Advisor and a Certified Farm Environment Planner meet the same criteria.

## Williamson, Don and Robyn

Submitter ID: 73957

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-2796	Oppose the provision with amendments	DELETE PPC1 in its entirety and produce a cost/benefit analysis of the long term (50 years) economic and social effects of PPC1 on drystock farmers and have this peer reviewed OR DELETE Nitrogen reference cap AND ADOPT a 30 year sub-catchment approach tailored to specific issues faced in each sub-catchment. AND AMEND to include achievable targets and goals in line with current technologies.
Full achievement of the Vision and Strategy will be intergenerational	PC1-2782	Support the provision with amendments	AMEND Full achievement of the Vision and Strategy by working with farmers to form a long-term plan by: AND CONSIDER revisiting the interpretation, including numerical interpretation through Table 3.11-1 and the numerical parameters, to ensure that it is achievable while giving effect to the Vision and Strategy AND AMEND PPC1 to have realistic achievable goals AND AMEND PPC1 to give farmers confidence to invest and encourages young people into the sector.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-2786	Support the provision with amendments	AMEND Objective 2 to explicitly state that the objective 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 paragraph of Objective 2 and include these words within Objective 1.
Objective 4: People and community resilience	PC1-2787	Oppose the provision	DELETE from Objective 4 reference to the staged approach and future plan changes. AND ADD a NEW Objective which provides for people and community resilience, adaptive management, and sub-catchment approaches led by communities.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-2798	Support the provision with amendments	AMEND Policy 4 so that small scale land use, low intensity and low risk land uses including forestry and farming can continue to be flexible, and to be established. AND DELETE references to further reductions in contaminant discharges. AND ENSURE that the existing biodiversity values of these land uses are recognised and that further protection of biodiversity is enabled and incentivised. This includes management benefits from reducing greenhouse gas emissions.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-2799	Oppose the provision with amendments	AMEND Rule 3.11.5.1 and 3.11.5.2 to incorporate them into one rule. AND AMEND to include as a permitted activity land use with stocking rates at or below 18 stock units and enable an increase up to this standard, but only if land capability is suitable. AND AMEND to relate to soil and geology i.e. LUC I, II, III, 20 stock units, LUC IV, V, 18 stock units or delete 6 stock unit standard. AND DELETE 4.1 hectares and provide for up to 20 hectares. AND AMEND to apply national stock exclusion requirements which relate to cattle, deer, and pigs, from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier, or other technologies) on flat and rolling land, but not hill country. AND AMEND to enable flexibility for land use, discharges and stocking rates up to these standards. AND DELETE any standards or clauses which hold land uses to historic discharge levels or stocking rates. AND DELETE 3.11.5.2(4)(c). AND AMEND riparian setback distances so they only apply to flat and rolling land and not hill country (i.e. slope >15 degrees).
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-2817	Oppose the provision with amendments	AMEND Rule 3.11.5.1 and 3.11.5.2 to incorporate them into one rule AND AMEND to include as a permitted activity land use with stocking rates at or below 18 stock units and enable an increase up to this standard, but only if land capability is suitable AND AMEND to relate to soil and geology i.e. LUC I, II, III, 20 stock units, LUC IV, V, 18 stock units or delete 6 stock unit standard AND DELETE 4.1 hectares and provide for up to 20 hectares AND AMEND to apply national stock exclusion requirements which relate to cattle, deer, and pigs, from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier, or other technologies) on flat and rolling land, but not hill country AND AMEND to enable flexibility for land use, discharges and stocking rates up to these standards AND DELETE any standards or clauses which hold land uses to historic discharge levels or stocking rates AND DELETE 3.11.5.2(4)(c)

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND riparian setback distances so they only apply to flat and rolling land and not hill country (i.e. slope >15 degrees) AND DELETE the Nitrogen Reference cap AND REPLACE with a sub-catchment plan (Land and Environment Plan).
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-2819	Oppose the provision with amendments	DELETE from Rule 3.11.5.4 the Nitrogen Reference cap AND REPLACE with a sub-catchment plan (Land and Environment Plan).
Schedule B - Nitrogen Reference Point	PC1-2821	Oppose the provision	DELETE the Nitrogen Reference cap in Schedule B AND REPLACE with a sub-catchment plan (Land and Environment Plan).
Schedule C - Stock exclusion	PC1-2834	Support the provision with amendments	DELETE the Nitrogen Reference cap AND REPLACE with a sub-catchment plan (Land and Environment Plan). (Schedule C)
Schedule 1 - Requirements for Farm Environment Plans	PC1-2822	Oppose the provision with amendments	DELETE (Schedule 1) the Nitrogen Reference cap AND REPLACE with a sub-catchment plan (Land and Environment Plan).

## Williamson, Jack

Submitter ID: 72769

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8919	Oppose the provision	DELETE PPC1 and prepare a plan that is fair to all farms AND / OR undertake more science to alleviate uncertainty about what PPC1 will mean.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-8920	Oppose the provision	AMEND to extend the reference period for Nitrogen Reference Points AND REMOVE the use of the OVERSEER Model to calculate Nitrogen Reference Points
Objective 4: People and community resilience	PC1-8921	Oppose the provision	AMEND to extend the reference period for Nitrogen Reference Points AND REMOVE the use of the OVERSEER Model to calculate Nitrogen Reference Points.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-8924	Support the provision with amendments	AMEND Policy 2 to extend the reference period for Nitrogen Reference Points. AND REMOVE the use of the OVERSEER Model to calculate Nitrogen Reference Points.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12969	Support the provision with amendments	AMEND Policy 2 to include stock exclusion alternatives where fencing is not practical or feasible.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12970	Support the provision with amendments	AMEND Policy 2 to ensure environmental and economic sustainability.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 7: Preparing for allocation in the future	PC1-8922	Oppose the provision	AMEND to extend the reference period for Nitrogen Reference Points AND REMOVE the use of the OVERSEER Model to calculate Nitrogen Reference Points.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-8925	Support the provision with amendments	AMEND to extend the reference period for Nitrogen Reference Points AND REMOVE the use of the OVERSEER Model to calculate Nitrogen Reference Points. AND AMEND Rule 3.11.5.2 to include stock exclusion alternatives where fencing is not practical or feasible.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-8930	Support the provision with amendments	AMEND to extend the reference period for Nitrogen Reference Points AND REMOVE the use of the OVERSEER Model to calculate Nitrogen Reference Points AND AMEND Rule 3.11.5.3 to include stock exclusion alternatives where fencing is not practical or feasible. AND AMEND to ensure environmental and economic sustainability.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-8931	Support the provision with amendments	AMEND to extend the reference period for Nitrogen Reference Points. AND REMOVE the use of the OVERSEER Model to calculate Nitrogen Reference Points. AND AMEND Rule 3.11.5.4 to include stock exclusion alternatives where fencing is not practical or feasible. AND AMEND to ensure environmental and economic sustainability.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-8926	Support the provision with amendments	AMEND to extend the reference period for Nitrogen Reference Points. AND REMOVE the use of the OVERSEER Model to calculate Nitrogen Reference Points. AND AMEND Rule 3.11.5.5 to include stock exclusion alternatives where fencing is not practical or feasible.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-8927	Support the provision with amendments	AMEND Rule 3.11.5.6 to extend the reference period for Nitrogen Reference Points AND REMOVE the use of the OVERSEER Model to calculate Nitrogen Reference Points.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13131	Support the provision with amendments	AMEND Rule 3.11.5.6 to include stock exclusion alternatives where fencing is not practical or feasible.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-8928	Support the provision with amendments	AMEND to extend the reference period for Nitrogen Reference Points. AND REMOVE the use of the OVERSEER Model to calculate Nitrogen Reference Points. AND AMEND Rule 3.11.5.7 to include stock exclusion alternatives where fencing is not practical or feasible.
Schedule B - Nitrogen Reference Point	PC1-8923	Oppose the provision	AMEND to extend the reference period for Nitrogen Reference Points AND REMOVE the use of the OVERSEER Model to calculate Nitrogen Reference Points.
Schedule C - Stock exclusion	PC1-8929	Support the provision with amendments	AMEND Schedule C to include stock exclusion alternatives where fencing is not practical or feasible.
Schedule 1 - Requirements for Farm Environment Plans	PC1-8932	Support the provision with amendments	AMEND Schedule 1 to ensure environmental and economic sustainability.

## Williamson, Stephen David

Submitter ID: 73040

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8664	Oppose the provision	DELETE PPC1 AND REPLACE it with a plan that clearly establishes a pathway for farmers to address environmental concerns while future proofing their businesses, with clear articulation of how the end state water quality outcomes will be achieved.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-8666	Oppose the provision	DELETE Objective 1 requirements for farms to be held at or below a property's Nitrogen Reference Point, especially for low discharging operations AND DELETE the use of the OVERSEER Model AND, if an allocation of nitrogen discharges is needed, base the allocation on the natural capacity of soils and not on existing land uses.
Objective 4: People and community resilience	PC1-8667	Oppose the provision	DELETE Objective 1 requirements for farms to be held at or below a property's Nitrogen Reference Point, especially for low discharging operations AND DELETE the use of the OVERSEER Model and, if an allocation of nitrogen discharges is needed, base the allocation on the natural capacity of soils and not on existing land uses.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-8668	Oppose the provision	DELETE Policy 2 requirements for farms to be held at or below a property's Nitrogen Reference Point, especially for low discharging operations AND DELETE the use of the OVERSEER Model AND, if an allocation of nitrogen discharges is needed, base the allocation on the natural capacity of soils and not on existing land uses.
Policy 7: Preparing for allocation in the future	PC1-8669	Oppose the provision	DELETE Policy 7 requirements for farms to be held at or below a property's Nitrogen Reference Point, especially for low discharging operations AND DELETE the use of the OVERSEER Model AND, if an allocation of nitrogen discharges is needed, base the allocation on the natural capacity of soils and not on existing land uses.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-8671	Oppose the provision	DELETE Rule 3.11.5.2 requirements for farms to be held at or below a property's Nitrogen Reference Point, especially for low discharging operations AND DELETE the use of the OVERSEER Model AND, if an allocation of nitrogen discharges is needed, base the allocation on the natural capacity of soils and not on existing land uses.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-8673	Oppose the provision	No specific decision sought for Rule 3.11.5.3. DELETE Rule 3.11.5.3
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-8674	Oppose the provision	DELETE the requirement for stock exclusion in Rule 3.11.5.4.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-8675	Oppose the provision	No specific decision sought for Rule 3.11.5.5.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-8676	Oppose the provision	No specific decision sought for Rule 3.11.5.6.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-8672	Oppose the provision	DELETE Rule 3.11.5.7 requirements for farms to be held at or below a property's Nitrogen Reference Point, especially for low discharging operations, AND DELETE the use of the OVERSEER Model, AND, if an allocation of nitrogen discharges is needed, base the allocation on the natural capacity of soils and not on existing land uses.
Schedule B - Nitrogen Reference Point	PC1-8670	Oppose the provision	DELETE Schedule B requirements for farms to be held at or below a property's Nitrogen Reference Point, especially for low discharging operations AND DELETE the use of the OVERSEER Model AND, if an allocation of nitrogen discharges is needed, base the allocation on the natural capacity of soils and not on existing land uses.
Schedule C - Stock exclusion	PC1-8677	Oppose the provision	No specific decision sought for Schedule C.
Schedule 1 - Requirements for Farm Environment Plans	PC1-8679	Oppose the provision	DELETE Schedule 1.

## Williamson, Terry

Submitter ID: 71228

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Collaborative approach	PC1-793	Oppose the provision	CONSIDER an evaluation of the collaborative approach and begin the PPC1 process again.
Full achievement of the Vision and Strategy will be intergenerational	PC1-792	Not stated	No specific decision sought for 3.11 Full achievement of the Vision and Strategy.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-767	Oppose the provision with amendments	AMEND Objective 1 to align water quality targets to the National Policy Statement for Freshwater Management. AND AMEND to include chemicals in the testing regime in Objective 1. AND AMEND to include roading/automotive discharges in Objective 1.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-770	Support the provision with amendments	REPLACE in Policy 1 (c) the provisions related to the historic Nitrogen Reference Point with a system that allows for land use potential.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12671	Support the provision with amendments	AMEND Policy 1 so that where fencing is problematic perhaps a water test could be the decider.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12672	Support the provision with amendments	AMEND Policy 1 to establish controls for bird and koi carp populations where applicable.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-774	Oppose the provision	Policy 2: Develop a sub-catchment plan to identify where problems are coming from.
Policy 5: Staged approach	PC1-776	Oppose the provision with amendments	AMEND Policy 5 by developing an 80-year model.
Policy 6: Restricting land use change	PC1-777	Oppose the provision with amendments	DELETE from Policy 6 the exception, as provided for by reference to Policy 16.
Policy 7: Preparing for allocation in the future	PC1-778	Oppose the provision with amendments	Provide an 80-year model to bring some reassurance to the agriculture industry. AND AMEND Policy 7(b) to provide the same rule for all.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-780	Support the provision	RETAIN Policy 9 as proposed.
Policy 10: Provide for point source discharges of regional significance	PC1-781	Oppose the provision	AMEND Policy 10 to apply the same provisions to all land users.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-782	Oppose the provision	AMEND Policy 11 to apply the same provisions to all land users.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-783	Oppose the provision	AMEND Policy 12 to apply the same provisions to all land users.
Policy 13: Point sources consent duration	PC1-784	Oppose the provision	AMEND Policy 13 to apply the same provisions to all land users.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-785	Oppose the provision	AMEND Policy 16 to apply the same provisions to all land users.
3.11.4 Implementation methods	PC1-786	Oppose the provision	No specific decision sought for 3.11.4 Methods.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-787	Oppose the provision	No specific decision sought for Rule 3.11.5.4.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-789	Oppose the provision	AMEND Schedule B to use an industry-approved tool instead of the OVERSEER Model and to use stock units/hectare up to a realistic threshold. No specific decision requested relating to animal weights in Table 1 of Schedule B. AND AMEND so that there is a common measure for every square metre of land.
Schedule 1 - Requirements for Farm Environment Plans	PC1-794	Oppose the provision	The submission did not provide further detail for Schedule 1.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-795	Oppose the provision	Table 3.11-1: The submission did not provide further detail.

## Wills, Alan Bryan

Submitter ID: 72954

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-1651	Support the provision with amendments	AMEND PPC1 to provide a review of the use of Nitrogen to cover the 4 contaminants AND AMEND to reconsider the relationship of Nitrogen and Phosphorous.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-1635	Oppose the provision	AMEND 3.11.5.3 as requested by Federated Farmers in their submission. [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is: 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 REMOVE Rule 3.11.5.2 (4) (c). AND ADD a NEW permitted activity rule to read: <u>"The use of land for farming activities (excluding commercial vegetable production) where the property area is greater than 4.1 hectares is a Permitted Activity provided that:</u> <u>1) The change in the use of land is not from non-milking dairy farming to milking dairy farming; or</u> <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> <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> AND AMEND PPC1 so that normal farming activities in rural areas are permitted activities. AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities.]

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-1636	Oppose the provision	<p>AMEND Rule 3.11.5.4 as requested by Federated Farmers in their submission.            [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is:            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 REMOVE Rule 3.11.5.2 (4) (c).            AND ADD a NEW permitted activity rule to read:  <u>"The use of land for farming activities (excluding commercial vegetable production) where the property area is greater than 4.1 hectares is a Permitted Activity provided that:</u>  <u>1) The change in the use of land is not from non-milking dairy farming to milking dairy farming; or</u>  <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>  <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>            AND AMEND PPC1 so that normal farming activities in rural areas are permitted activities.            AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities.]</p>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-1639	Oppose the provision	<p>AMEND Rule 3.11.5.7 as requested by Federated Farmers in their submission.            [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is:            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 REMOVE Rule 3.11.5.2 (4) (c).            AND ADD a NEW permitted activity rule to read:  <u>"The use of land for farming activities (excluding commercial vegetable production) where the property area is greater than 4.1 hectares is a Permitted Activity provided that:</u>  <u>1) The change in the use of land is not from non-milking dairy farming to milking dairy farming; or</u>  <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>  <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>            AND AMEND PPC1 so that normal farming activities in rural areas are permitted activities.            AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities.]</p>
Schedule B - Nitrogen Reference Point	PC1-1640	Oppose the provision	AMEND Schedule B as requested by Federated Farmers in their submission.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			[AMEND Schedule B 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 B. 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 B match the Policies, Methods, definitions, etc, to which Schedule B relates.]
Schedule C - Stock exclusion	PC1-1646	Oppose the provision	AMEND Schedule C as requested by Federated Farmers in their submission. [AMEND Schedule C 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 C 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 C match the Policies, Methods, definitions, etc. to which Schedule C relates AND REMOVE requirements for fencing off water bodies AND AMEND to adopt the Government's Clean Water Package 2017 stock exclusion standards as an interim measure AND DEVELOP more detailed proposals at a sub-catchment level later, through a freshwater management unit based assessment, and implemented then through a sub-catchment based plan change AND MAKE any consequential amendments to PPC1.]
Schedule 1 - Requirements for Farm Environment Plans	PC1-1647	Support the provision with amendments	AMEND Schedule 1 as requested by Federated Farmers in their submission. [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.]

## Wilson, David Lesley

Submitter ID: 67510

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7251	Support the provision with amendments	AMEND PPC1 to manage all contaminating activities including storm water and treated sewerage discharges. AND AMEND so that municipal discharges are required to improve water quality before discharging.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to include treatment of E.coli/Algal blooms at point of source (e.g. treatment in the hydro lakes). WITHDRAW PPC1 and NOTIFY a plan change that covers the whole region. AND AMEND so that everyone is treated equally and fairly. AND AMEND to include provisions for clearing Koi Carp from the river system.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-7249	Support the provision with amendments	AMEND Policy 12 to manage all sources of contaminants, including storm water and treated sewerage discharges. AND AMEND so that municipal discharges are required to improve water quality before discharging.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-7324	Support the provision with amendments	CONSIDER in Rule 3.11.5.1 the response of farms to lower stocking rate requirements.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-7325	Support the provision with amendments	CONSIDER in Rule 3.11.5.2 the response of farms to lower stocking rate requirements.
Schedule B - Nitrogen Reference Point	PC1-7252	Oppose the provision with amendments	REMOVE from Schedule C the use of the OVERSEER Model to determine leaching, AND REPLACE with sampling from rivers and streams to identify areas of leaching.

## Wilson, Mark

Submitter ID: 73923

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 10: Provide for point source discharges of regional significance	PC1-5185	Support the provision with amendments	AMEND Policy 10 to include non-point source. AND AMEND to provide for 25 year consents
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-5186	Support the provision with amendments	AMEND Policy 11 to include non-point source. AND AMEND to provide for 25 year consents
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-5187	Support the provision with amendments	AMEND Policy 12 to include non-point source. AND AMEND to provide for 25 year consents
Policy 13: Point sources consent duration	PC1-5188	Support the provision with amendments	AMEND Policy 13 to include non-point source. AND AMEND to provide for 25 year consents
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-5181	Oppose the provision	DELETE Rule 3.11.5.7 in its entirety.
Schedule B - Nitrogen Reference Point	PC1-5182	Oppose the provision	DELETE Schedule B – Part g, in its entirety.
Schedule C - Stock exclusion	PC1-5184	Oppose the provision	AMEND Schedule C to adopt the Clean Water Accord 2017.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule 1 - Requirements for Farm Environment Plans	PC1-5180	Oppose the provision	No specific decision was requested for Schedule 1.

## Win Dee Farms (2007) Ltd

Submitter ID: 73787

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-11569	Not stated	No specific relief sought for PPC1.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-9054	Oppose the provision	<p>AMEND Rule 3.11.5.3 to allow Farm Environmental Plans to be completed by 2026 rather than 2023 AND AMEND Rule 3.11.5.3 as requested by Federated Farmers in their submission [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is:</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.</p> <p>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.</p> <p>AND REMOVE Rule 3.11.5.2 (4) (c).</p> <p>AND ADD a NEW permitted activity rule to read:</p> <p><u>"The use of land for farming activities (excluding 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>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-9055	Oppose the provision	<p>AMEND Rule 3.11.5.4 to allow Farm Environmental Plans to be completed by 2026 rather than 2023.</p> <p>AND AMEND Rule 3.11.5.4 as requested by Federated Farmers in their submission [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is:</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.</p> <p>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.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND REMOVE Rule 3.11.5.2 (4) (c).</p> <p>AND ADD a NEW permitted activity rule to read:  <u>"The use of land for farming activities (excluding commercial vegetable production) where the property area is greater than 4.1 hectares is a Permitted Activity provided that:</u>  <u>1) The change in the use of land is not from non-milking dairy farming to milking dairy farming; or</u>  <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>  <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.  AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities.]</p>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-9056	Oppose the provision	<p>AMEND Rule 3.11.5.7 as requested by Federated Farmers in their submission  [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>
Schedule A - Registration with Waikato Regional Council	PC1-9057	Support the provision with amendments	<p>AMEND Schedule A to ensure that there are no additional charges and Council can utilise property information provided to farm industry related businesses.</p>
Schedule B - Nitrogen Reference Point	PC1-9058	Oppose the provision	<p>AMEND Schedule B to allow farmers who did not own a farm in the reference years, 3 to 5 years to accurately reflect a nutrient level within industry guidelines.  AND AMEND Schedule B as requested by Federated Farmers in their submission.  [AMEND Schedule B 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 B.  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 B match the Policies, Methods, definitions, etc, to which Schedule B relates.]</p>
Schedule C - Stock exclusion	PC1-9059	Oppose the provision	<p>AMEND Schedule C as requested by Federated Farmers in their submission.  [AMEND Schedule C 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 C  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 C match the Policies, Methods, definitions, etc. to which Schedule C relates  AND REMOVE requirements for fencing off water bodies AND AMEND to adopt the Government's Clean Water Package 2017 stock exclusion standards as an interim measure  AND DEVELOP more detailed proposals at a sub-catchment level later, through a freshwater management unit based assessment, and implemented then through a sub-catchment based plan change</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND MAKE any consequential amendments to PPC1.]
Schedule 1 - Requirements for Farm Environment Plans	PC1-9153	Oppose the provision	AMEND Schedule 1 as requested by Federated Farmers [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.]
Schedule 1 - Requirements for Farm Environment Plans	PC1-12563	Oppose the provision	AMEND Schedule 1 to allow a 3 to 5 year extended period for farmers to establish a nutrient budget that reflects an accurate account of farming practices, if the current farm owners were not the owners during the Nitrogen Reference Point reference years.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12564	Oppose the provision	AMEND Schedule 1 to give definite answers on the costs of a Farm Environment Plan and its requirements.

## Windust, Ross Kenyon

Submitter ID: 74029

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4735	Oppose the provision	No specific decision sought for PPC1.

## Wiremu Trust

Submitter ID: 73969

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-8860	Support the provision with amendments	AMEND PPC1 to have hydro operations contribute money to subsidise the Council to employ staff to help land owners with mitigation on land CONSIDER reviewing the timeframes set in PPC1.
Background and explanation	PC1-8831	Oppose the provision	AMEND PPC1 so that targets are set for each sub-catchment, rather than each property, and set the target at the 75th percentile for the sub-catchment, such that the community for that sub-catchment collectively seek to achieve the target.
3.11.1 Values and uses for the Waikato and Waipa Rivers	PC1-8832	Support the provision with amendments	RETAIN 3.11.1 Values and Uses.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-8833	Support the provision with amendments	AMEND Policy 2 (c) to establish the Nitrogen Reference Point for the catchment or sub-catchment, and apply that to the property or enterprise.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-8834	Support the provision	RETAIN Policy 4 management of diffuse discharges at a sub-catchment scale.
Policy 10: Provide for point source discharges of regional significance	PC1-8835	Support the provision with amendments	AMEND Policy 10 to allow diffuse dischargers the same privileges as point source dischargers.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-8836	Support the provision with amendments	AMEND Policy 11 to give the same allowance to diffuse dischargers that point source dischargers have.
3.11.4.3 Farm Environment Plans	PC1-8837	Support the provision with amendments	AMEND Method 3.11.4.3 to require the certified person to work with the land based industry proprietors in an educational manner, not as an auditor.
3.11.4.5 Sub-catchment scale planning	PC1-8839	Support the provision	RETAIN the Method 3.11.4.5 focus on working together in a sub-catchment.
3.11.4.6 Funding and implementation	PC1-8840	Support the provision	RETAIN the Method 3.11.4.6 focus on working together in a sub-catchment.
3.11.4.7 Information needs to support any future allocation	PC1-8841	Support the provision	RETAIN the Method 3.11.4.7 focus on working together in a sub-catchment.
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-8842	Support the provision	RETAIN the Method 3.11.4.8 focus on working together in a sub-catchment.
3.11.4.9 Managing the effects of urban development	PC1-8844	Support the provision	RETAIN the Method 3.11.4.9 focus on working together in a sub-catchment.
3.11.4.10 Accounting system and monitoring	PC1-8845	Support the provision	RETAIN the Method 3.11.4.10 focus on working together in a sub-catchment.
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-8846	Support the provision	RETAIN the Method 3.11.4.11 focus on working together in a sub-catchment.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-8849	Support the provision with amendments	AMEND Rule 3.11.5.2 (4)(a) to establish the Nitrogen Reference Point at the catchment scale, and apply that back to properties. DELETE Rule 3.11.5.2 (4)(c). DELETE Rule 3.11.5.2 (4)(d). AMEND Rule 3.11.5.2 (4)(e)(ii) to have Department of Conservation properties follow the same rules as other land owners. AMEND Rule 3.11.5.2 (3)(b)(i) to a 5 year average (at October) stocking rate annually.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm	PC1-8851	Support the provision with amendments	No specific decision was sought for Rule 3.11.5.3.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Environment Plan under a Certified Industry Scheme			
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-8852	Oppose the provision	AMEND Rule 3.11.5.4 Matters of Control (iii) to have the Nitrogen Reference Point set at the sub-catchment level AND AMEND to use a five year rolling average nitrogen loss with all properties.
Schedule B - Nitrogen Reference Point	PC1-8856	Oppose the provision	AMEND Schedule B to use all farm Nitrogen Reference Point data and average it on a per hectare basis, and use this as a catchment or sub-catchment reference. AMEND Schedule B (g)(i) to the Lincoln 2003 stock unit definition of a 450kg dairy cow producing 385 kgMS as 8.4 stock units. AMEND Schedule B, Table 1, Farm Model to leave non-contiguous properties that are part of the same enterprise as separate entities.
Schedule C - Stock exclusion	PC1-8861	Support the provision with amendments	No specific decision sought for Schedule C.
Schedule 1 - Requirements for Farm Environment Plans	PC1-8858	Support the provision with amendments	AMEND Schedule 1 to require practitioners to have appropriate experience in the area and with the soil types No specific decision sought with respect to cost of Farm Environment Plans.
Definition - Stock unit	PC1-8857	Oppose the provision	AMEND Definition - Stock Unit to the Lincoln 2003 stock unit definition of a 450kg dairy cow producing 385 kgMS as 8.4 stock units.

## Wood, Doreen and Neville

Submitter ID: 58939

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-15	Oppose the provision	AMEND PPC1 so that it is not just farmers who pay the price of making rivers swimmable.
Background and explanation	PC1-19	Oppose the provision	AMEND PPC1 so that the plan does not cost thousands of dollars for a very small number of swimmers.

## Woodacre Partnership

Submitter ID: 67313

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4371	Support the provision	RETAIN Objective 6 (withdrawn) in its current form AND RETAIN restoring the Whangamarino Wetland under Policy 15 (withdrawn)

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND Policy 15 (withdrawn) to be holistic and include all sources influencing the health and well-being of the Waikato River and its catchments especially pest fish species, in relation to sub-catchment management.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-4143	Support the provision with amendments	RETAIN the Objective 1 long-term restoration and protection of water quality for the Waikato and Waipā Rivers AND AMEND by removing flood/high flow conditions from water quality target data AND AMEND PPC1 to be holistic and include all sources influencing the health and well-being of the Waikato River and its catchments, including koi carp, point source discharges, and hydro dams AND AMEND by addressing contaminants on a sub-catchment basis, to enable targeting of the highest emitting sub-catchments.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-4168	Support the provision with amendments	RETAIN the Objective 2 maintenance of long-term social, economic and cultural well-being in the Waikato and Waipā catchment communities AND WITHDRAW PPC1 until the Hauraki Iwi area has been included, the Vision and Strategy amended, and a Section 32 analysis of the revised impact of PPC1 has been conducted AND AMEND PPC1 provisions to remove the Nitrogen Reference Point to align with intention of Objective 2 AND AMEND by enabling appropriate water quality mitigation strategies to be adopted through tailored Farm Environment Plans to align with the intention of Objective 2 AND AMEND by addressing contaminants on a sub-catchment basis, to enable targeting of the highest emitting sub-catchments to align with the intention of Objective 2 AND AMEND by developing robust indicators to measure social, economic and cultural well-being.
Objective 3: 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	PC1-4172	Support the provision with amendments	RETAIN the Objective 3 ten per cent achievement by 2026 of the long-term water quality targets AND AMEND PPC1 provisions to remove the Nitrogen Reference Point AND AMEND by adopting a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment AND AMEND by enabling appropriate water quality mitigation strategies to be adopted through tailored Farm Environment Plans.
Objective 4: People and community resilience	PC1-4173	Support the provision with amendments	RETAIN the staged approach of Objective 4 AND AMEND PPC1 provisions to remove the Nitrogen Reference Point and land use change restrictions AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. AND AMEND by enabling appropriate water quality mitigation strategies to be adopted through tailored Farm Environment Plans.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-4178	Support the provision	AMEND PPC1 to acknowledge primary production as a core value to reflect Mana Tangata.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-4188	Support the provision with amendments	AMEND PPC1 rules to reflect Policy 1 and 9.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12673	Support the provision with amendments	AMEND Policy 1 by clarifying how slope is measured given the ranges of topography within each paddock and adjoining watercourses.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12674	Support the provision with amendments	RETAIN Policy 1 management of diffuse discharges and water quality on a sub-catchment basis.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12675	Support the provision with amendments	AMEND Policy 1 by enabling appropriate water quality mitigation strategies to be adopted through tailored Farm Environment Plans.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-4203	Support the provision with amendments	RETAIN the Policy 2 approach of appropriate water quality mitigation strategies to be adopted through tailored Farm Environment Plan.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12971	Support the provision with amendments	AMEND PPC1 rules to remove the Nitrogen Reference Point.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12972	Support the provision with amendments	AMEND PPC1 to reflect Policy 2 in adopting a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-4207	Support the provision with amendments	RETAIN Policy 4 provisions allowing for low intensity land uses to continue and establish AND REMOVE any signalling of future mitigation action requirements.
Policy 5: Staged approach	PC1-4214	Support the provision with amendments	RETAIN the Policy 5 staged approach AND AMEND PPC1 rules to remove Nitrogen Reference Point AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment AND AMEND to enable appropriate water quality mitigation strategies to be adopted through tailored Farm Environment Plans.
Policy 6: Restricting land use change	PC1-4221	Oppose the provision with amendments	AMEND PPC1 to provide a Restricted Discretionary activity status for high priority sub-catchments and a Permitted activity status for low priority sub-catchments (in relation to water quality) AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment AND AMEND by enabling appropriate water quality mitigation strategies to be adopted through tailored Farm Environment Plans.
Policy 7: Preparing for allocation in the future	PC1-4227	Support the provision with amendments	RETAIN Policy 7 reduction of diffuse discharges while considering land suitability AND AMEND Policy 7 by enabling appropriate water quality mitigation strategies to be adopted through tailored Farm Environment Plans AND AMEND to ensure Waikato Regional Council works collaboratively with stakeholder groups to develop a sub-catchment management approach.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 8: Prioritised implementation	PC1-4228	Support the provision	RETAIN Policy 8.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-4229	Support the provision with amendments	RETAIN the Policy 9 management of water quality on a sub-catchment level AND AMEND PPC1 rules to reflect Policy 1 and 9 AND AMEND by enabling appropriate water quality mitigation strategies to be adopted through tailored Farm Environment Plans.
Policy 10: Provide for point source discharges of regional significance	PC1-4230	Support the provision with amendments	RETAIN the consideration of the regional significance of point source discharges infrastructure and industry in Policy 10 AND AMEND PPC1 to be holistic and include all sources influencing the health and well-being of the Waikato River and its catchments, including koi carp, point source discharges and hydro dams AND AMEND by adopting a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-4231	Support the provision with amendments	RETAIN the Policy 11 application of Best Practicable Options AND AMEND to include all stakeholders, for example through Farm Environment Plans AND AMEND by providing clarification on what is a 'significant toxic adverse effect' AND AMEND PPC1 rules to reflect Policy 11.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-4233	Support the provision with amendments	RETAIN the Policy 12 consideration of past technology upgrades and associated costs AND AMEND PPC1 to allow consideration of past technology upgrades and associated costs to occur across all discharge sources AND AMEND by adopting a sub-catchment management approach to ensure collaborative and fair management of resources within the region.
Policy 13: Point sources consent duration	PC1-4236	Support the provision with amendments	RETAIN the Policy 13 consideration of the magnitude and significance of the investment in contaminant reduction measures when determining consent duration AND AMEND by providing consideration of the magnitude and significance of the investment in contaminant reduction measures when determining consent duration to all property owners and enterprises within the Waikato and Waipā catchments.
Policy 14: Lakes Freshwater Management Units	PC1-4239	Support the provision	RETAIN Policy 14.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-4241	Support the provision with amendments	RETAIN the Policy 16 flexibility for development of Māori land AND AMEND PPC1 to include a rule to reflect Policy 16 AND AMEND by considering a similar flexibility for all property owners and enterprises.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-4243	Support the provision with amendments	WITHDRAW PPC1 until the Hauraki Iwi area and the Waikato River Authority's Vision and Strategy have been amended AND RETAIN the Policy 17 application of policies and methods based on the Vision and Strategy.
3.11.4.1 Working with others	PC1-4246	Support the provision	RETAIN Method 3.11.4.1.
3.11.4.2 Certified Industry Scheme	PC1-4248	Support the provision	RETAIN Method 3.11.4.2.
3.11.4.3 Farm Environment Plans	PC1-4257	Support the provision with amendments	RETAIN the Method 3.11.4.3 tailored, risk based Farm Environment Plan approach AND AMEND to provide for the Farm Environment Plan time frame to be negotiated between the Farm Environment Planner and the farmer

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			AND AMEND to enable land users who have adequate experience and capabilities to work with an approved industry or scheme run by the Waikato Regional Council and be accredited to develop their own Farm Environment Plan based upon a common template.
3.11.4.4 Lakes and Whangamarino Wetland	PC1-4265	Support the provision with amendments	RETAIN the Method 3.11.4.4 approach of working with others in relation to lakes and Whangamarino Wetland AND RETAIN Method 3.11.4.4(d) management of pest weeds and fish AND AMEND PPC1 to include the management of pest weeds and fish in the policies, objectives and rules within the Waikato and Waipā Catchments.
3.11.4.5 Sub-catchment scale planning	PC1-4269	Support the provision with amendments	RETAIN the Method 3.11.4.5 management of diffuse discharges and water quality on a sub-catchment level AND AMEND PPC1 to reflect Method 3.11.4.5 sub-catchment scale management in the rules.
3.11.4.6 Funding and implementation	PC1-4271	Support the provision	RETAIN Method 3.11.4.6.
3.11.4.7 Information needs to support any future allocation	PC1-4272	Support the provision with amendments	RETAIN Method 3.11.4.7 gaining of data AND AMEND PPC1 to enable the management of diffuse discharges on a sub-catchment basis.
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-4274	Support the provision with amendments	RETAIN Method 3.11.4.8 gaining of data AND AMEND PPC1 to enable the management of diffuse discharges on a sub-catchment basis.
3.11.4.9 Managing the effects of urban development	PC1-4277	Support the provision	RETAIN Method 3.11.4.9.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-4280	Support the provision	RETAIN Method 3.11.4.12.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-4286	Support the provision with amendments	RETAIN the Rule 3.11.5.1 Permitted Activity status to enable low intensity land uses to continue and establish AND AMEND PPC1 stock exclusion provisions to conform with the proposed amendments to the National Policy Statement for Freshwater Management AND AMEND by providing clarification on how and where to measure slope on undulating land.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-4323	Support the provision with amendments	RETAIN the Rule 3.11.5.2 Permitted Activity status for low intensity land uses AND AMEND the Rule 3.11.5.2 introduction to read: "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 area is greater than 4.1 hectares, and has more than 6 stock units per hectare <u>but less than 18 stock units per hectare at the 30 June 2016</u> or is used for arable cropping, is a permitted activity subject to the following conditions:..." AND REMOVE 3.11.5.2(3)(b)(i) AND REMOVE 3.11.5.2(4)(a) (Nitrogen Reference Point) AMEND 3.11.5.2.4(c) to read: "No part of the property or enterprise over <del>15</del> <u>25</u> degrees slope is cultivated <del>or grazed unless effects of diffuse discharges can be mitigated</del> ; and" AND AMEND PPC1 to provide clarification around stock exclusion requirements for setback buffers and where to measure setback from on undulating land

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<p>AND AMEND PPC1 stock exclusion provisions to conform with the proposed amendments to the National Policy Statement for Freshwater Management</p> <p>AND AMEND to address contaminants on a sub-catchment basis to enable targeting of the highest emitting sub-catchments</p> <p>AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through tailored Farm Environment Plans.</p>
<p>3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme</p>	<p>PC1-4331</p>	<p>Support the provision with amendments</p>	<p>RETAIN the Rule 3.11.5.3 provisions for Farm Environment Plans and the Certified Industry Scheme and stock exclusion where practical</p> <p>AND REMOVE 3.11.5.3(2) (Nitrogen Reference Point)</p> <p>AMEND Rule 3.11.5.3(3) to read: "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>AND AMEND PPC1 to provide clarification around stock exclusion requirements for setback buffers and where to measure setback from on undulating land</p> <p>AND AMEND to address contaminants on a sub-catchment basis to enable targeting of the highest emitting sub-catchments</p> <p>AND AMEND to provide clarification on how long a Farm Environment Plan will be viable for.</p>
<p>3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme</p>	<p>PC1-4343</p>	<p>Support the provision with amendments</p>	<p>RETAIN Rule 3.11.5.4 provisions for Farm Environment Plans, the Certified Industry Scheme and stock exclusion where practical</p> <p>AND REMOVE the Nitrogen Reference Point from Rule 3.11.5.4</p> <p>AND AMEND to provide consent duration of 15 years or more.</p> <p>Rule 3.11.5.4: AND AMEND PPC1 to address contaminants on a sub-catchment basis to enable targeting of the highest emitting sub-catchments</p> <p>AND AMEND to provide clarification around stock exclusion requirements for setback buffers and where to measure setback from on undulating land</p> <p>AND AMEND to provide clarification on how long a Farm Environment Plan will be viable for.</p>
<p>3.11.5.7 Non-Complying Activity Rule – Land Use Change</p>	<p>PC1-4353</p>	<p>Oppose the provision with amendments</p>	<p>AMEND PPC1 to address contaminants on a sub-catchment basis to enable targeting of the highest emitting sub-catchments</p> <p>AND AMEND Rule 3.11.5.7 by changing the activity status for land use change to Restricted Discretionary for high priority sub-catchments, and limit discretion to the management of the diffuse discharges of the four contaminants</p> <p>AND AMEND by changing the activity status for land use change to Permitted for low priority sub-catchments</p> <p>AND AMEND to enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made through a tailored Farm Environment Plan.</p>
<p>Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments</p>	<p>PC1-4163</p>	<p>Oppose the provision with amendments</p>	<p>AMEND Table 3.11-1 to align the attribute targets with the National Policy Statement for Freshwater Management and Waikato River Authority's Vision and Strategy</p> <p>AND AMEND by removing flood/high flow conditions from water quality target data.</p>

## Woods, Paula and Ken

Submitter ID: 73806

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 5: Staged approach	PC1-2462	Oppose the provision with amendments	AMEND Policy 5 by implementing a longer time period that is workable so long term strategies can be planned ahead, over 30 years for example.
Policy 7: Preparing for allocation in the future	PC1-2458	Oppose the provision with amendments	AMEND Policy 7 by implementing a longer time period that is workable.
3.11.4.3 Farm Environment Plans	PC1-2463	Support the provision	No specific decision sought for Rule 3.11.4.3.
Schedule B - Nitrogen Reference Point	PC1-2453	Oppose the provision with amendments	AMEND Schedule B by excluding the Nitrogen Reference Points for sheep and beef farmers.
Schedule C - Stock exclusion	PC1-2457	Support the provision with amendments	AMEND Schedule C by REMOVING the requirement to fence waterways over 15% slope. As an alternative, water systems could be used in paddocks where the slope is larger than 15%.

## Worsp, Simon Wynn & Rosemary Elizabeth

Submitter ID: 71269

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Full achievement of the Vision and Strategy will be intergenerational	PC1-905	Oppose the provision	DELETE in the section titled 'Full achievement of the Vision and Strategy will be intergenerational' references to restricting land use change and Farm Environment Plans. Including reference in the last paragraph starting 'In the short term...' and the second bullet point starting 'Farm Environment Plans...', on page 15.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-922	Oppose the provision	DELETE parts of Objective 1 relating to long term land use. AND DELETE parts of Objective 1 relating to the Nitrogen Reference Point. AND AMEND Objective 1 to contain rules for Koi Carp elimination and measurement of all contributions to contaminant discharges including city storm water.
Objective 3: 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	PC1-924	Oppose the provision	DELETE parts of Objective 3 relating to long term land use and Nitrogen Reference Point. AND AMEND Objective 3 to contain rules for Koi Carp elimination and measurement of all contributions to contaminant discharges including city storm water.
Objective 4: People and community resilience	PC1-925	Oppose the provision	DELETE parts of Objective 4 relating to long term land use and Nitrogen Reference Point.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-926	Oppose the provision	AMEND Policy 1 to contain rules for Koi Carp elimination and measurement of all contributions to contaminant discharges including city storm water.



Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-931	Oppose the provision	DELETE Policy 2 provision relating to the Nitrogen Reference Point.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12973	Oppose the provision	DELETE Policy 2 provisions relating to Farm Environment Plans AND if not deleted AMEND to develop National Farm Environment Plan Guidelines, allow landowners to develop own Farm Environment Plan based on these guidelines and identify who will decide on Farm Environment Plan prerequisites.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12974	Oppose the provision	AMEND Policy 2 to contain rules for Koi Carp elimination and measurement of all contributions to contaminant discharges including city storm water.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-927	Oppose the provision	AMEND Policy 4 to contain rules for Koi Carp elimination and measurement of all contributions to contaminant discharges including city storm water.
Policy 5: Staged approach	PC1-928	Oppose the provision	DELETE Policy 5 provisions relating to long term land use.
Policy 6: Restricting land use change	PC1-906	Oppose the provision	DELETE Policy 6 restricting land use change provisions.
Policy 7: Preparing for allocation in the future	PC1-929	Oppose the provision	DELETE Policy 7 provisions relating to long term land use and Nitrogen Reference Point. AND AMEND to contain rules for Koi Carp elimination and measurement of all contributions to contaminant discharges including city storm water.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-932	Support the provision	AMEND Policy 9 to include a sub-catchment approach into the rules. AND MAKE any consequential amendments arising from the submission process to include a sub-catchment approach.
3.11.4.1 Working with others	PC1-933	Support the provision	AMEND Method 3.11.4.1 to include a sub-catchment approach in the rules. AND MAKE any consequential amendments arising from the submission process to include a sub-catchment approach.
3.11.4.5 Sub-catchment scale planning	PC1-934	Support the provision	AMEND Method 3.11.4.5 to include a sub-catchment approach in the rules. AND any consequential amendments arising from the submission process to include a sub-catchment approach.
3.11.5 Rules	PC1-923	Support the provision	ADD a NEW Rule for the elimination of koi carp. AND CONSIDER the all contributions to contaminant discharges including city storm water. AND make any consequential amendments arising from the submission process.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-944	Support the provision with amendments	AMEND Rule 3.11.5.1 to reflect stock exclusion recommendations/definitions in the National Policy Statement for Freshwater and the National Water Accord. AND AMEND Rule 3.11.5.1 to extend stock exclusion timelines. AND MAKE any stock exclusion consequential amendments arising from the submission process.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-945	Support the provision with amendments	AMEND Rule 3.11.5.2 to reflect stock exclusion recommendations/definitions in the National Policy Statement for Freshwater and the National Water Accord. AND AMEND Rule 3.11.5.2 to extend stock exclusion timelines. AND MAKE any stock exclusion consequential amendments arising from the submission process.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-947	Support the provision with amendments	DELETE from Rule 3.11.5.3 the provisions relating to Farm Environment Plans and the Nitrogen Reference Point. AMEND Rule 3.11.5.3 to reflect stock exclusion recommendations/definitions in the National Policy Statement for Freshwater and National Water Accord. AND AMEND Rule 3.11.5.3 to extend stock exclusion timelines. AND make any stock exclusion consequential amendments arising from the submission process. AND AMEND Rule 3.11.5.3 to contain rules for Koi Carp elimination and measurement of all contributions to contaminant discharges including city storm water.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-948	Support the provision with amendments	DELETE from Rule 3.11.5.4 provisions relating to long term land use, Farm Environment Plans and the Nitrogen Reference Point. AND AMEND Rule 3.11.5.4 to reflect stock exclusion recommendations/definition by the National Policy Statement for Freshwater and National Water Accord. AND AMEND Rule 3.11.5.4 to extend stock exclusion timelines. AND MAKE any stock exclusion consequential amendments arising from the submission process. AND AMEND Rule 3.11.5.4 to contain rules for Koi Carp elimination and measurement of all contributions to contaminant discharges including city storm water.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-949	Oppose the provision with amendments	DELETE from Rule 3.11.5.5 provisions relating to long term land use, Farm Environment Plans and the Nitrogen Reference Point. AND AMEND Rule 3.11.5.5 to contain rules for Koi Carp elimination and measurement of all contributions to contaminant discharges including city storm water.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-950	Oppose the provision with amendments	DELETE from Rule 3.11.5.6 the provisions relating to the Nitrogen Reference Point.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13132	Oppose the provision with amendments	DELETE from Rule 3.11.5.6 the provisions relating to Farm Environment Plans.
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13133	Oppose the provision with amendments	AMEND Rule 3.11.5.6 to contain rules for Koi Carp elimination and measurement of all contributions to contaminant discharges including city storm water.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-971	Support the provision with amendments	DELETE from Rule 3.11.5.7 the restricting land use change provisions. AND AMEND Rule 3.11.5.7 to contain rules for Koi Carp elimination and measurement of all contributions to contaminant discharges including city storm water.
Schedule 1 - Requirements for Farm Environment Plans	PC1-976	Support the provision with amendments	DELETE from Schedule 1 provisions relating to long term land use, Farm Environment Plans and the Nitrogen Reference Point.
Schedule 1 - Requirements for Farm Environment Plans	PC1-12565	Oppose the provision with amendments	AMEND Schedule 1 to consider contribution of all to contaminant discharges including city storm water.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-930	Support the provision with amendments	AMEND Table 3.11-1 to consider contribution of all to contaminant loss including city storm water.

## Wrenn, Kevin Phillip

Submitter ID: 73399

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-6131	Oppose the provision	CONSIDER a review of the legal mandate for Waikato Regional Council implementing PPC1 (managing the 'effects'). AND OR return the managing of 'effects to the Territorial Authority. AND CONSIDER a review and test of the science behind PPC1. AND CONSIDER undertaking a robust cost benefit analysis to support PPC1. AND MAKE any consequential amendments including the objectives, polices and rules to give effect to the relief sought.

## Wright, Arthur James

Submitter ID: 72827

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-4781	Support the provision with amendments	AMEND PPC1 to identify hill country farming as a separate entity and have separate rules from dairy farming.

## Wright, Nathan John

Submitter ID: 72624

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-3082	Oppose the provision	DELETE Objective 1 and re-consult with the aim of providing certainty and reassurance that hill country farming has a viable future.
Objective 3: 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	PC1-3083	Oppose the provision	DELETE Objective 3 and re-consult with the aim of providing certainty and reassurance that hill country farming has a viable future.
Policy 6: Restricting land use change	PC1-3084	Oppose the provision	DELETE Policy 6.
3.11.4.3 Farm Environment Plans	PC1-3089	Support the provision	No specific relief requested for Method 3.11.4.3.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.4.4 Lakes and Whangamarino Wetland	PC1-3090	Support the provision	AMEND Method 3.11.4.4 to add a plan to eradicate or control koi carp to meet sediment targets.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-3085	Oppose the provision	AMEND Rule 3.11.5.1(5) to ensure that the stocking rate is 18 stock units per hectare.
Schedule B - Nitrogen Reference Point	PC1-3086	Oppose the provision	DELETE Schedule B. A sub-catchment approach where farmers are educated on the best nitrogen management practices that can be included in a Farm Environment Plan would be more appropriate.
Schedule 1 - Requirements for Farm Environment Plans	PC1-3087	Oppose the provision	AMEND Schedule 1(2)(a)ii from 25 to 15 degrees.

## Yeates, Graeme David

Submitter ID: 71259

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-345	Oppose the provision	AMEND Rule 3.11.5.1 to ensure the definition of water bodies amended in Schedule C from anything permanently flowing to more significant water bodies, like a (central) wetland area. AND AMEND the timeframes in Schedule C for total stock exclusion so that these will be extended and these changes are reflected in Rule 3.11.5.1.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-351	Oppose the provision	AMEND Rule 3.11.5.2 to ensure the definition of water bodies amended in Schedule C from anything permanently flowing to more significant water bodies, like a (central) wetland area. AND AMEND the timeframes in Schedule C for total stock exclusion so that these will be extended and these changes are reflected in Rule 3.11.5.2.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-347	Oppose the provision	AMEND Rule 3.11.5.3 to ensure the definition of water bodies amended in Schedule C from anything permanently flowing to more significant water bodies, like a (central) wetland area. AND AMEND the timeframes in Schedule C for total stock exclusion so that these will be extended and these changes are reflected in Rule 3.11.5.3.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-348	Oppose the provision	AMEND Rule 3.11.5.4 to ensure the definition of water bodies amended in Schedule C from anything permanently flowing to more significant water bodies, like a (central) wetland area. AND AMEND the timeframes in Schedule C for total stock exclusion so that these will be extended and these changes are reflected in Rule 3.11.5.4.
Schedule C - Stock exclusion	PC1-344	Oppose the provision	AMEND Schedule C to ensure the definition of water bodies is changed from anything permanently flowing to more significant water bodies, like a (central) wetland area. AND AMEND the timeframes in Schedule C for total stock exclusion so that these will be extended.

## Yeates, Marilyn

Submitter ID: 71172

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-146	Oppose the provision	Submitter did not provide further comment for PPC1.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-222	Oppose the provision	Submitter did not provide further comment for Rule 3.11.5.3.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-223	Oppose the provision	Submitter did not provide further comment for Rule 3.11.5.4.
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-224	Oppose the provision	Rule 3.11.5.5 Submitter did not provide further comment
Schedule C - Stock exclusion	PC1-145	Oppose the provision	Submitter did not provide further comment for Schedule C.
5.1.5 Conditions for Permitted Activity Rule 5.1.4.11 and Standards and Terms for Controlled Activity Rules	PC1-147	Oppose the provision	Submitter did not provide further comment for 5.1.5.

## Young, Peter Robert Orr

Submitter ID: 73228

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-4297	Oppose the provision	<p>AMEND Rule 3.11.5.3 as per Federated Farmers submission, [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is:</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.</p> <p>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.</p> <p>AND REMOVE Rule 3.11.5.2 (4) (c).</p> <p>AND ADD a NEW permitted activity rule to read:</p> <p><u>"The use of land for farming activities (excluding commercial vegetable production) where the property area is greater than 4.1 hectares is a Permitted Activity provided that:</u></p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<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. AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities.]</p> <p>AND AMEND the cultivation slope of less than 15 degrees to 25 degrees, AND AMEND to provide for stock exclusion requirements to be in line with new Government direction for drystock farming.</p>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-4298	Oppose the provision	<p>AMEND Rule 3.11.5.4 as per Federated Farmers submission [Federated Farmers do not have a specific decision sought for this rule. Their decision sought for Rules general is: 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 REMOVE Rule 3.11.5.2 (4) (c). AND ADD a NEW permitted activity rule to read: <u>"The use of land for farming activities (excluding 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. AND AMEND PPC1 so it facilitates the carrying out of existing activities and the establishment of new activities.]</p> <p>AND AMEND to increase the cultivation slope to 25 degrees.</p>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-4299	Oppose the provision	<p>AMEND in Rule 3.11.5.7 the drystock land use to enable a dairy/sheep and beef farmer to merge part/or whole of his drystock units into a dairy operation, AND AMEND to enable the sale of drystock titles to dairying neighbours with an average regional dairying Nitrogen Reference Point instead of limiting low drystock nitrogen emitters.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Schedule B - Nitrogen Reference Point	PC1-4301	Oppose the provision	AMEND Schedule B to provide a wider range of years to calculate a Nitrogen Reference Point.
Schedule C - Stock exclusion	PC1-4306	Oppose the provision	AMEND Schedule C to remove the requirement to fence land that is greater than 15 degrees. AND AMEND to include water reticulation in Schedule C.
Schedule 1 - Requirements for Farm Environment Plans	PC1-4321	Oppose the provision	AMEND Schedule 1 as requested by Federated Farmers in their submission. [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.]

## Young, Ronald Ivan

Submitter ID: 73362

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-9826	Oppose the provision	AMEND Rule 3.11.5.2 to calculate a reference point according to soil type rather than for nitrogen.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-9827	Oppose the provision	No specific decision sought for Rule 3.11.5.3.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-9828	Not stated	No specific decision requested for Rule 3.11.5.4.
Schedule C - Stock exclusion	PC1-9829	Oppose the provision	AMEND to consider what is actually trying to be achieved and the need for amendments.
Schedule 1 - Requirements for Farm Environment Plans	PC1-9834	Oppose the provision	No specific decision sought for Schedule 1.

## Yule, Don, Lauris and Yvette

Submitter ID: 73096

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-11558	Support the provision	RETAIN Objective 6 AMEND Policy 15 to be holistic and include all sources influencing the health and well-being of the Waikato River and its catchments.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-11523	Support the provision with amendments	AMEND Objective 1 to address contaminants on a sub-catchment basis to enable targeting of the highest emitting sub-catchments. AMEND PPC1 to include all factors influencing river health and well-being.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-11524	Support the provision with amendments	RETAIN Objective 2 WITHDRAW PPC1 until the Hauraki Iwi area and the Waikato River Authority's Vision and Strategy has been amended, and a section 32 analysis has been conducted to investigate the revised impact of PPC1 AND AMEND PPC1 to remove the Nitrogen Reference Point AND AMEND to enable appropriate mitigation strategies through Farm Environment Plans that align with the intention of Objective 2 AND AMEND to address contaminants on a sub-catchment basis to enable targeting of the highest emitting sub-catchments AND AMEND to develop robust indicators of social, economic and cultural well-being.
Objective 3: 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	PC1-11525	Support the provision with amendments	AMEND PPC1 to remove the Nitrogen Reference Point AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment AND AMEND to enable appropriate mitigation strategies through tailored Farm Environment Plans.
Objective 4: People and community resilience	PC1-11526	Support the provision	RETAIN the staged approach of Objective 4 AMEND PPC1 to remove the Nitrogen Reference Point and the land use change restriction AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment AND ENABLE appropriate mitigation strategies through tailored Farm Environment Plans.
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-11527	Support the provision with amendments	AMEND PPC1 to acknowledge primary production as a core value to reflect Mana Tangata.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12676	Support the provision with amendments	AMEND Policy 1 to enable appropriate mitigation strategies through tailored Farm Environment Plans.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12677	Oppose the provision with amendments	AMEND Policy 1 to read: ' c. 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>



Plan Section	Submission Point ID	Support or Oppose	Decision requested
			<u>d. 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> AND CLARIFY how to measure slope given topographical variation.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-11528	Support the provision with amendments	AMEND PPC1 rules to reflect Policy 1.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12976	Oppose the provision	Policy 2 - REMOVE the Nitrogen Reference Point from the rules.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12977	Support the provision with amendments	AMEND PPC1 to reflect Policy 2 in adopting a sub-catchment management approach.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-11529	Support the provision with amendments	RETAIN the adoption of mitigation strategies through a tailored Farm Environment Plan in Policy 2.
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-11530	Support the provision with amendments	AMEND Policy 4 provisions allowing low intensity land uses to continue and establish AND REMOVE any signalling of future mitigation action requirements.
Policy 5: Staged approach	PC1-11531	Support the provision with amendments	RETAIN the Policy 5 staged approach. Policy 5: AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment AND AMEND the rules to remove the Nitrogen Reference Point AND AMEND to enable appropriate mitigation strategies through tailored Farm Environment Plans.
Policy 6: Restricting land use change	PC1-11533	Oppose the provision	AMEND PPC1 to give land use change in sub-catchments of high priority for water quality a restricted discretionary activity status and in low priority sub-catchments a permitted activity status AND AMEND PPC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment, and enable appropriate mitigation strategies through tailored Farm Environment Plans.
Policy 7: Preparing for allocation in the future	PC1-11534	Support the provision	RETAIN Policy 7 Policy 7: AMEND PPC1 to enable appropriate mitigation strategies through tailored Farm Environment Plans AND REQUIRE the Council to work collaboratively with stakeholder groups to develop sub-catchment management approaches.
Policy 8: Prioritised implementation	PC1-11535	Support the provision	RETAIN Policy 8.
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-11536	Support the provision with amendments	RETAIN Policy 9 Policy 9: AMEND PPC1 rules to reflect Policy 9 AND AMEND to enable appropriate mitigation strategies through tailored Farm Environment Plans.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
Policy 10: Provide for point source discharges of regional significance	PC1-11537	Support the provision with amendments	RETAIN Policy 10 consideration of the regional significance of infrastructure and industry point source discharges. AMEND PPC1 to include all factors influencing the health and well-being of the Waikato River, AND ADOPT a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-11538	Support the provision with amendments	RETAIN Policy 11 Best Practicable Options AND AMEND to include all stakeholders AND CLARIFY a 'significant toxic adverse effect' AMEND PPC1 rules to reflect Policy 11.
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-11539	Support the provision with amendments	RETAIN Policy 12(b) AMEND PPC1 to allow considerations of past technology upgrades and staging of mitigations to occur across all discharge sources, by enabling appropriate mitigation strategies through tailored Farm Environment Plans AND ADOPT a sub-catchment management approach to ensure collaborative and fair management of resources within the region.
Policy 13: Point sources consent duration	PC1-11540	Support the provision with amendments	RETAIN Policy 13(b) AND AMEND to all property owners and enterprises within the Waikato and Waipā catchments.
Policy 14: Lakes Freshwater Management Units	PC1-11541	Support the provision	RETAIN Policy 14.
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-11542	Support the provision with amendments	AMEND PPC1 to include a rule to reflect Policy 16 AND AMEND Policy 16 to consider a similar flexibility for all property owners and enterprises.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-11543	Support the provision with amendments	WITHDRAW PPC1 until the withdrawn area is included and the Vision and Strategy has been amended.
3.11.4.1 Working with others	PC1-11544	Support the provision	RETAIN Method 3.11.4.1.
3.11.4.3 Farm Environment Plans	PC1-11545	Support the provision with amendments	AMEND Method 3.11.4.3 to enable land users with adequate experience and capabilities to work with an approved industry scheme, run by Waikato Regional Council, to be accredited to develop their own Farm Environment Plan, based on a common template.
3.11.4.4 Lakes and Whangamarino Wetland	PC1-11546	Support the provision with amendments	AMEND PPC1 to include the management of pest weeds and fish in the objectives, policies and rules for the Waikato and Waipā catchments.
3.11.4.5 Sub-catchment scale planning	PC1-11547	Support the provision with amendments	AMEND PPC1 to reflect Method 3.11.4.5 in the rules.
3.11.4.6 Funding and implementation	PC1-11548	Support the provision	RETAIN Method 3.11.4.6.
3.11.4.7 Information needs to support any future allocation	PC1-11549	Support the provision with amendments	AMEND PPC1 to enable the management of diffuse discharges on a sub-catchment basis in the future.
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-11550	Support the provision with amendments	AMEND PPC1 to enable the management of diffuse discharges on a sub-catchment basis in the future.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.4.9 Managing the effects of urban development	PC1-11551	Support the provision	RETAIN Method 3.11.4.9.
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-11552	Support the provision	RETAIN Method 3.11.4.12.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-11553	Support the provision with amendments	AMEND Rule 3.11.5.1(2) to read: '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 CLARIFY how to measure slope on undulating land.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-11554	Support the provision with amendments	AMEND Rule 3.11.5.2(2) to read '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 AMEND PPC1 to remove the Nitrogen Reference Point from the rules AND AMEND to address contaminants on a sub-catchment basis with targeting of the highest emitting sub-catchments AND AMEND to enable appropriate mitigation strategies through tailored Farm Environment Plans AMEND Rule 3.11.5.2 Introduction to read: 'The use of land for farming activities...where the property area is greater than 4.1 hectares, and has more than 6 stock units per hectare " <u>but less than 18 stock units per hectare at the 30 June 2016,</u> " or is used for arable cropping, is a permitted activity subject to the following conditions:...' AND DELETE Rule 3.11.5.2 (3)(b)(i), AND AMEND Rule 3.11.5.2 (4)(c) to read: 'No part of the property or enterprise over <del>15</del> <u>25</u> degrees slope is cultivated <del>or grazed</del> <u>unless effects of diffuse discharges can be mitigated</u> ". AND CLARIFY stock exclusion requirements for setback buffers and where to measure setbacks from on undulating land.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-11555	Support the provision with amendments	AMEND Rule 3.11.5.3 to ensure stock exclusion is required only where practical AND AMEND to address contaminants on a sub-catchment basis, to enable targeting of the highest emitting sub-catchments, AND AMEND Rule 3.11.5.3(3) to read: '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 DELETE the Nitrogen Reference Point from the rules AND CLARIFY how long a Farm Environment Plan will be viable for AND CLARIFY stock exclusion requirements with regard to setback buffer distance and where to measure the setback from on undulating land.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-11556	Support the provision with amendments	AMEND Rule 3.11.5.4 to ensure stock exclusion is required only where practical AND DELETE the Nitrogen Reference Point from the rules AND AMEND Matter of Control (v) to recommend a minimum 15 years consent duration AND CLARIFY stock exclusion requirements with regard to setback buffer distance and where to measure the setback from on undulating land.

Plan Section	Submission Point ID	Support or Oppose	Decision requested
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-11557	Oppose the provision	AMEND Rule 3.11.5.7 to give land use change in sub-catchments of high priority for water quality a restricted discretionary activity status and in low priority sub-catchments a permitted activity status AND AMEND to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment, and enable appropriate mitigation strategies through tailored Farm Environment Plans.
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-12300	Oppose the provision	DELETE flood/high flow conditions from water quality target data.

## Zetland Farms Ltd

Submitter ID: 73756

Plan Section	Submission Point ID	Support or Oppose	Decision requested
General	PC1-7117	Oppose the provision with amendments	AMEND PPC1 so its goals are realistic and achievable over a number of years. AND AMEND to an approach that investigates and addresses the major sources of contaminants.