

Appendix 2: Description of matters raised by Submitters (by issue)

Issue 1: Categorisation of Provisions to the Freshwater Planning Process

Sub-issue(s)	Description of matters raised by submitters
Categorisation of provisions to the Freshwater Planning Process	Winstone Aggregates [S206.022] (supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.018]) raises concern with provisions being subject to the FPP where freshwater is only a peripheral issue to which the provision relates, and considers this is inappropriate use of the FPP, resulting in jurisdictional problems such as restricted appeal rights. Considers improper allocation results in delays and costs and is exacerbated by the proposed activity statuses being too restrictive. Accordingly, Winstone Aggregates seeks for a review of the scope of FPP versus P1S1 processes, and for only provisions where freshwater is the primary issue to be subject to the FPP, with the remaining provisions to be allocated to P1S1.

Issue 2: Overall Approach

Sub-issue(s)	Description of matters raised by submitters
Costs of regulation	<p>Akatarawa Valley Residents¹ express concern about the “cost to be borne by rural landowners with no evidence that they are the cause of the issue, and the lack of information available on what fees and charges GWRC will levy”. The Akatarawa Valley Residents submitters seek that “<i>all rules that add cost to landowners be reconsidered and ‘recalibrated’ with scientific evidence, whereby the more important issues are tackled instead of a ‘broad brush approach’ to all perceived issues</i>”. They also seek reconciliation of PC1 with other regulations relevant to rural landowners (including UHCC’s PC50).</p> <p>Various other individual farmer submitters² expressed concern that the cost of implementing the proposed changes on farms will be very high and will significantly impact farm viability as financial implications fall directly to individual landowners in rural communities.</p> <p>Maryanne Gill [S42.007] expressed the need to consider losses on grazing area on farms not just from PC1 but from the existence of SNAs.</p> <p>WFF [S193.004] (opposed by Forest & Bird [FS23.960]) considers that the direct and opportunity costs of proposed policies and rules to be too high for rural landowners and amount to a form or ‘managed retreat’.</p>
Farming and water quality	<p>Riu Huna Farm [S39.006], Maryanne Gill [S42.005], Sharyn Hume [S95.002], The Shellards [S202.001], Kelly & Lewis Few-Mackay [S205.002 and S205.004], Terawhiti Farming [S224.004] (supported in part by Meridian [FS47.022]), Te Kamaru Station [S229.004] (supported in part by Meridian [FS47.027]), Te Marama [S231.005] and Jody Louise Sinclair, Joshua William Lowry, Anne Friedarika Sinclair & Tracey Lynn Browne [S276.006, S276.008 and S276.010] make the general assertion that the water quality problem to be addressed by managing rural land use is not clearly articulated or supported by evidence/information, including submissions that the Council’s logic is flawed and demonstrates a bias by focusing on farming as the source of contaminants.</p> <p>Upper Hutt Rural Communities³ and M. Garcia [S287.010 and S287.012] submit that water quality information shows that contamination in Te Awa Kairangi (Hutt River) is not originating from the Akatarawa and Mangaora sub-catchments (being rural sub-catchments) but from downstream of the Taita Gorge. These submitters seek deferral of further action until better information is available and the withdrawal of measures targeted towards the Upper Hutt farming community.</p>

¹ John Van Nortwick & Jill Van Nortwick [S120.006], Karen Wallace & Mark Robbins [S121.006], Paul Lambert & Steph Lambert [S122.006], Sandy Cooper [S123.006], Fredrick Steensma [S124.006], Shoshanah Phillips [S125.006], Russell Judd & Cecile Judd [S126.006], Johanna Overdiep & Steve Sturgess [S127.006], Joany Grima & Allen Rockell [S128.006], Keith Budd & Liz Budd [S129.006], Pete Clark [S130.006], Gillian Taylor & Chris Taylor [S131.006], Hannah Dawson & Ryan Dawson [S132.006], Len Drabble [S133.006], Graeme Allan [S134.006], Joshua Wood [S135.006], Micayla Wood [S136.006], Jonathan Wood [S137.006], Tony Wood & Helen Wood [S138.006], Glenda Arnold [S139.006], Janet Collins [S140.006], George Hare [S141.006], Paul Arnold [S142.006], Chilly Brook Trust (Mary Redington) [S143.006], Gaylene Ward & Mike Ward [S144.006], Nigel Parry & Judy Parry [S145.006], Leanna Jackson & Carl Burns [S146.006], Joline Fowke & Owen Fowke [S147.006], Paul Baker [S148.006], Allan MacDonald [S149.006], Phyllis Strachan [S150.006], John Raffan & Heather Raffan [S152.006], Redington Family Trust (Mary Redington) [S153.006], Ash Barker & Kes Barker [S154.006], Susan Davidson [S155.006], John Bryce [S156.006], Dr Patricia Laing [S157.006], Erica Dawson [S158.006], Bruce Stevens & Theresa Stevens [S159.006], Dr Harold Cuffe [S160.006], Phil Kirycuk [S162.006], John Simister [S163.006], Sarah Purdy [S164.006], Dr Anna De Raadt & Roger Fairclough [S166.006], Allan and Sarah Kelly [S167.006], Barry Hearfield & Carol McGhie [S168.006], Karina Fraser & Grant Fraser [S170.006], Jessica Perno & Gavin Perno [S171.006], Thomas Davies [S172.006] and Pam Ritchie [S174.006]

² William Gill [S180.002], Terawhiti Farming [S224.003] (supported in part by Meridian [FS47.021]), Te Kamaru Station [S229.003] (supported in part by Meridian [FS47.026]), Te Marama [S231.004], Riu Huna Farm [S39.007], Maryanne Gill [S42.001 and S42.002], David and Carolyn Gratton [S58.002 and S58.005]

³ Bob Anker [S59.006] (opposed by MPHRCI [FS27.1255]), [S59.010] (opposed by MPHRCI [FS27.1260]); Darren Pettengell [S60.006] (opposed by MPHRCI [FS27.1333]), [S60.010] (opposed by MPHRCI [FS27.1337]), [S60.011] (opposed by MPHRCI [FS27.1338]); Lenard Drabble [S61.006] (opposed by MPHRCI [FS27.1502]), [S61.010] (opposed by MPHRCI [FS27.1506]), [S61.011] (opposed by MPHRCI [FS27.1507]); Jacqui Thompson [S62.006] (opposed by MPHRCI [FS27.1398]), [S62.010] (opposed by MPHRCI [FS27.1402]), [S62.011] (opposed by MPHRCI [FS27.1403]); Callum Graeme Ritchie Forbes [S63.006] (opposed by MPHRCI [FS27.1307]), [S63.010] (opposed by MPHRCI [FS27.1311]), [S63.011] (opposed by MPHRCI [FS27.1312]); Linda Forbes Williamson [S64.006] (opposed by MPHRCI [FS27.1515]), [S64.010] (opposed by MPHRCI [FS27.1519]), [S64.011] (opposed by MPHRCI [FS27.1520]); Rhiannon Forbes

	<p>Kim Bowen [S103.001] and John Bowen [S117.001] express similar concern that there is only one monitoring site in the Makara River and consider this does not give an accurate idea of where contaminants are originating from.</p> <p>Mākara and Ohariu large farms [S51.007], Terawhiti Farming [S224.007] and Te Kamaru Station [S229.007] assert that the lack of water quality data mean that Council has had to make assumptions based on modelling which are not fit for purpose.</p> <p>Riu Huna Farm [S39.012] considers wider contaminant sources across Mākara and Ohariu are speculative and there is little acknowledgement of flooding and associated construction and remedial works along Takarau Gorge or the increasing number of houses being built and the potential for erosion and increases in sedimentation from these activities.</p> <p>Louise Askin [S9.009] seeks for the list in Method M44 to be expanded to include other non-regulatory measures proposed in the WIP, including support for catchment groups, additional water quality monitoring programmes, provisions of local information/ data and development of “catchment context, challenges and values”.</p> <p>Sharyn Hume [S95.003] states that the sources must be known for each catchment to be addressed appropriately and considers that work to reduce E. coli should only be targeted in areas where it is shown to be an issue. The submitter considers it is inappropriate to extrapolate the results of one monitoring site across all of Mākara and Ohariu. The submitter suggests that local water quality studies are necessary, and seeks an option to undertake landowner-led, farm-scale monitoring.</p>
Pest and pest management	<p>Akatarawa Valley Residents⁴ note that residents have to deal with incursion of pest species onto their land from GWRC. They also submit that pest species adversely impact stocking levels and prevent landowners from increasing indigenous biodiversity”. They seek that GWRC actively manage pest on GWRC land that border the Akatarawa valley.</p> <p>David and Pauline Innes [S234.007] and Craig Innes [S277.006] are similarly concerned the effects of pest species on publicly owned land have not been taken into account and seek that public authorities undertake more pest control on public land. They say that private landowners should not be restricted because of the effects of pest animals on private land. No specific decision is requested.</p> <p>John Boyle [S181.009] is concerned that 1080 drops on GWRC-managed land will affect waterways and soil quality.</p> <p>Heather Phillips [S212.005] is concerned that pest animals and wild animals are not to be counted as stock units, despite grazing on local land and causing erosion damage, and that pest animals are not addressed in the plan change.</p>

[S65.006] (opposed by MPHRCI [FS27.1593]), [S65.010] (opposed by MPHRCI [FS27.1597]), [S65.011] (opposed by MPHRCI [FS27.1598]); Jon-Luke Clarke Harvey [S66.006] (opposed by MPHRCI [FS27.1463]), [S66.010] (opposed by MPHRCI [FS27.1467]), [S66.011] (opposed by MPHRCI [FS27.1468]); Peter Thompson [S67.006] (opposed by MPHRCI [FS27.1567]), [S67.010] (opposed by MPHRCI [FS27.1571]), [S67.011] (opposed by MPHRCI [FS27.1572]); Gail Thomson [S68.006] (opposed by MPHRCI [FS27.1359]), [S68.010] (opposed by MPHRCI [FS27.1363]), [S68.011] (opposed by MPHRCI [FS27.1364]); Susan Patricia Boyle [S69.006] (opposed by MPHRCI [FS27.1619]), [S69.010] (opposed by MPHRCI [FS27.1623]), [S69.011] (opposed by MPHRCI [FS27.1624]); John Peter Boyle [S70.006] (opposed by MPHRCI [FS27.1450]), [S70.010] (opposed by MPHRCI [FS27.1454]), [S70.011] (opposed by MPHRCI [FS27.1455]); Brendon Allen Greig [S71.006] (opposed by MPHRCI [FS27.1281]), [S71.010] (opposed by MPHRCI [FS27.1285]), [S71.011] (opposed by MPHRCI [FS27.1286]); Angela Marie Greig [S72.006] (opposed by MPHRCI [FS27.1268]), [S72.010] (opposed by MPHRCI [FS27.1272]), [S72.011] (opposed by MPHRCI [FS27.1273]); Philip Eales [S73.006] (opposed by MPHRCI [FS27.1580]), [S73.010] (opposed by MPHRCI [FS27.1584]), [S73.011] (opposed by MPHRCI [FS27.1585]); Teresa Eales [S74.006] (opposed by MPHRCI [FS27.1632]), [S74.010] (opposed by MPHRCI [FS27.1636]), [S74.011] (opposed by MPHRCI [FS27.1637]); Lynn Marion Bialy [S75.006] (opposed by MPHRCI [FS27.1528]), [S75.010] (opposed by MPHRCI [FS27.1532]), [S75.011] (opposed by MPHRCI [FS27.1533]); Richard Charles Bialy [S76.006] (opposed by MPHRCI [FS27.1606]), [S76.010] (opposed by MPHRCI [FS27.1610]), [S76.011] (opposed by MPHRCI [FS27.1611]); JoAnn McCready [S77.006] (opposed by MPHRCI [FS27.1437]), [S77.010] (opposed by MPHRCI [FS27.1441]), [S77.011] (opposed by MPHRCI [FS27.1442]); Bob Curry [S78.006] (opposed by MPHRCI [FS27.1242]), [S78.010] (opposed by MPHRCI [FS27.1246]), [S78.011] (opposed by MPHRCI [FS27.1247]); Bob McLellan [S79.006] (opposed by MPHRCI [FS27.1229]), [S79.010] (opposed by MPHRCI [FS27.1233]), [S79.011] (opposed by MPHRCI [FS27.1234]); Bridget M Myles [S80.006] (opposed by MPHRCI [FS27.1294]), [S80.010] (opposed by MPHRCI [FS27.1298]), [S80.011] (opposed by MPHRCI [FS27.1299]); David McCready [S81.006] (opposed by MPHRCI [FS27.1346]), [S81.010] (opposed by MPHRCI [FS27.1350]), [S81.011] (opposed by MPHRCI [FS27.1351]); Meaghan Fitzgerald [S82.006] (opposed by MPHRCI [FS27.1541]), [S82.010] (opposed by MPHRCI [FS27.1545]), [S82.011] (opposed by MPHRCI [FS27.1546]); Kevin Nash [S83.006] (opposed by MPHRCI [FS27.1489]), [S83.010] (opposed by MPHRCI [FS27.1493]), [S83.011] (opposed by MPHRCI [FS27.1494]); Karen Nash [S84.006] (opposed by MPHRCI [FS27.1476]), [S84.010] (opposed by MPHRCI [FS27.1480]), [S84.011] (opposed by MPHRCI [FS27.1481]); Jennifer Sparrow [S86.006] (opposed by MPHRCI [FS27.1411]), [S86.010] (opposed by MPHRCI [FS27.1415]), [S86.011] (opposed by MPHRCI [FS27.1416]); Grant Munro [S87.006] (opposed by MPHRCI [FS27.1385]), [S87.010] (opposed by MPHRCI [FS27.1389]), [S87.011] (opposed by MPHRCI [FS27.1390]); Colleen Munro [S88.006] (opposed by MPHRCI [FS27.1320]), [S88.010] (opposed by MPHRCI [FS27.1324]), [S88.011] (opposed by MPHRCI [FS27.1325]); Joan Elizabeth Hutson [S89.006] (opposed by MPHRCI [FS27.1424]), [S89.010] (opposed by MPHRCI [FS27.1428]), [S89.011] (opposed by MPHRCI [FS27.1429]); Peter Jeffery Hutson [S90.006] (opposed by MPHRCI [FS27.1554]), [S90.010] (opposed by MPHRCI [FS27.1558]), [S90.011] (opposed by MPHRCI [FS27.1559]); Graeme Shellard [S91.006] (opposed by MPHRCI [FS27.1372]), [S91.010] (opposed by MPHRCI [FS27.1376]), [S91.011] (opposed by MPHRCI [FS27.1377])

⁴ John Van Nortwick & Jill Van Nortwick [S120.007], Karen Wallace & Mark Robbins [S121.007], Paul Lambert & Steph Lambert [S122.007], Sandy Cooper [S123.007], Fredrick Steensma [S124.007], Shoshanah Phillips [S125.007], Russell Judd & Cecile Judd [S126.007], Johanna Overdiep & Steve Sturgess [S127.007], Joany Grima & Allen Rockell [S128.007], Keith Budd & Liz Budd [S129.007], Pete Clark [S130.007], Gillian Taylor & Chris Taylor [S131.007], Hannah Dawson & Ryan Dawson [S132.007], Len Drabble [S133.007], Graeme Allan [S134.007], Joshua Wood [S135.007], Micayla Wood [S136.007], Jonathan Wood [S137.007], Tony Wood & Helen Wood [S138.007], Glenda Arnold [S139.007], Janet Collins [S140.007], George Hare [S141.007], Paul Arnold [S142.007], Chilly Brook Trust (Mary Redington) [S143.007], Gaylene Ward & Mike Ward [S144.007], Nigel Parry & Judy Parry [S145.007], Leanna Jackson & Carl Burns [S146.007], Joline Fowke & Owen Fowke [S147.007], Paul Baker [S148.007], Allan MacDonald [S149.007], Phyllis Strachan [S150.007], John Raffan & Heather Raffan [S152.007], Redington Family Trust (Mary Redington) [S153.007], Ash Barker & Kes Barker [S154.007], Susan Davidson [S155.007], John Bryce [S156.007], Dr Patricia Laing [S157.007], Erica Dawson [S158.007], Bruce Stevens & Theresa Stevens [S159.007], Dr Harold Cuffe [S160.007], Phil Kircuk [S162.007], John Simister [S163.007], Sarah Purdy [S164.007], Dr Anna De Raadt & Roger Fairclough [S166.007], Allan and Sarah Kelly [S167.007], Barry Hearfield & Carol McGhie [S168.007], Karina Fraser & Grant Fraser [S170.007], Jessica Perno & Gavin Perno [S171.007], Thomas Davies [S172.007], Pam Ritchie [S174.007]

	Donald Love [S102.008] comments on the sediment risk factors in Table D1 of Schedule 36 noting that there continues to be substantial damage from pig rooting where wild pigs are harbouring on WRC land and that there are related issues with deer. He seeks that the plan makes clear the responsibilities for wild animals including the responsibility of GWRC.
Non-regulatory support	<p>Sharyn Hume [S95.001], Terawhiti Farming [S224.006], Te Kamaru Station [S229.006], Riu Huna Farm [S39.011], Te Marama [S231.007 and S231.008], and Mākara and Ohariu large farms [S51.006] all seek that GWRC prioritise Method M44 prior to implementing new rules and that a “farm-scale approach” be integrated into PC1’s sediment and erosion control policies. They also seek compensation if large-scale land retirement progresses and increased GWRC support for additional water quality monitoring activities in the Mākara and Ohariu catchments (including community-led monitoring).</p> <p>WFF [S193.054]⁵ seeks the replacement of the proposed wording directing GWRC to:</p> <p><i>work in partnership with primary sector organisations and landowners to support an integrated catchment management approach including collection of baseline biophysical and ecological data at catchment scale, development of Freshwater Action Plans at catchment scale, preparation of Catchment Context, Challenges and Risks documents as set out in the national Freshwater Farm Plan Regulations, and directing Council assistance with riparian planting, erosion and sediment control for 100% of farms in rural catchments by x date, eg, 2030 (similar to that provided for in NRP Method M12)</i></p> <p>Louise Askin [S9.010] seeks that the words “in partnership with the community” be added in the description.</p> <p>PCC [S240.022] (opposed by NZFFA [FS9.119]), Christine Stanley [S26.011], Hannah Gray [S105.010] and Taranaki Whānui [S286.016]⁶ support Method 44 in principle but consider it lacks detail in terms of time and methodology (such as, for example, a timeframe of the programme of engagement with small landowners) and seek that such detail be added.</p> <p>CFG [S288.016] (opposed by Forest & Bird [FS23.040]) consider the rates relief set out in Method M44 are likely to be miniscule to zero, given that land will no commercial value upon implementation of PC1.</p> <p>Porirua Harbour Trust & Guardians of Pāuatahanui Inlet [S176.011] do not seek change but stress the need for full implementation of Method M44.</p> <p>Jo McCready [S94.006] makes a general submission expressing a preference for non-regulatory methods and pointing to recommendations of the TAoP WIP and the importance of resourcing positive support, such as through GWRC’s Environmental Restoration and Catchment teams and actions, rather than on regulatory enforcement.</p> <p>Donald Love [S102.009] notes confusion about what is bad management practice and notes that the only existing GWRC guide relates to earthworks controls (rather than farming). He seeks retention of clause (c) and its commitment to promote the uptake of good management practice.</p> <p>EDS [S222.020]⁷ seek that the word wetland be included in the chapeau along with the other surface and coastal water features.</p> <p>Pauatahanui Residents Association [S16.006 and S16.007] seek for Method M44 to be retained as notified, emphasising that rural landowners should be supported through measures that include, but are not limited to, those outlined in Method M44. Pauatahanui Residents Association also consider that better outcomes would be achieved if PC1 was weighted in accordance with Recommendations 58, 59, 60, 61 and 64 of Te Awarua-o-Porirua Whaitua Implementation Programme, focusing on resourcing support and actions rather than on enforcement.</p> <p>Yvonne Weeber [S183.176] (supported by MPHRCI [FS27.176]), Fish and Game [S188.030]⁸, and NZFFA Wellington [S36.035] support Method M44, with no reasons stated or decision requested.</p> <p>Guildford Timber, Silverstream Forest and Goodwin Estate [S210.019] seeks for Method M44 to be retained as notified or to be updated to include reference to investigating the extension of rates relief to District Council rates.</p> <p>Lynn Cadenhead [S22.021], Neil Deans [S29.008] and Diane Strugnell [S5.005] seek for Method M44 to be retained as notified.</p>

⁵ supported by Hort NZ [FS1.026], opposed by Forest & Bird [FS23.1010]

⁶ supported by Ātiawa ki Whakarongotai Charitable Trust [FS2.013], supported by Rangitāne [FS24.016]

⁷ supported by Forest & Bird [FS23.176], supported by MPHRCI [FS27.912], opposed by NZFFA [FS9.201]

⁸ supported by Forest & Bird [FS23.1186], MPGC [FS21.035] and MPHRCI [FS27.1119], opposed by NZFFA [FS9.030]

Stream shading	<p>Fish and Game⁹, Forest & Bird¹⁰, Yvonne Weeber¹¹, Winstone Aggregates [S206.045 and S206.073] and PCC [S240.056] (opposed by NZFFA [FS9.153]) all support Policies WH.P27 and P.P25.</p> <p>While broadly supportive of stream shading, WFF¹² seek an amendment to refer to GWRC “supporting” rather than simply “promoting” stream shading.</p> <p>EDS¹³ seek an amendment to consider requiring rather than just promoting stream shading. Pareraho Forest Trust [S213.023] seeks to remove the qualifier so that shading is not promoted just to achieve periphyton TASSs, but to achieve other water quality outcomes.</p> <p>Urban Edge Planning Group on behalf of Mangaroa Farms Ltd [S194.011] seek for the retention of Policy WH.P27, or for their active involvement in any changes that would result in a more restrictive framework relating to rural land use activities of Mangaroa Farms.</p> <p>Terawhiti Farming [S224.014], Te Kamaru Station [S229.014] and Te Marama [S231.014] seek for Policy WH.P27 to be amended to “where economically practical to do so”.</p> <p>UHCC [S225.089] (opposed by Forest & Bird [FS23.917]), Taranaki Whānui [S286.058] (supported by Rangitāne [FS24.058]), Mākara and Ohariu large farms [S51.011] and Louise Askin [S9.022] seek for Policy WH.P27 to be retained as notified.</p> <p>CFG¹⁴ supports Policies WH.P27 and P.P25.</p> <p>Riu Huna Farm [S39.019] seek for the details of Policy WH.P27 to be consistent with the content and timing for Freshwater Farm Plans.</p>
Map clarity	<p>Pauatahanui Residents Association [S16.002], Christine Stanley [S26.002 and S26.008] and Riu Huna Farm [S39.010], Annette Cairns [S55.003] (supported by NZCF [FS50.003]), Jo McCready and [S94.002] raise concerns relating to mapping of erosion risk and the ability to identify individual properties.</p> <p>Winstone Aggregates [S206.018] (supported by NZCF [FS50.177]) seeks for the mapping to be reviewed, with the current approach to be relied on until robust mapping is undertaken.</p> <p>Craig Innes [S277.002] considers that identifying streams by coordinates is an inappropriate level of identification and that each stream should be shown on a map with reference to features that are identifiable by readers.</p> <p>Urban Edge Planning Group on behalf of Pandion Limited [S98.002]</p>
Provisions PC1 disapplied by PC1s	<p>Policy P70</p> <p>Mark Phillips [S109.001] submits on Policy P70 for the amendment of erosion controls, noting that GWRC is selecting regenerating land with low stock units to control erosion rather than deforested plantation forestry blocks, which is inconsistent with the Government's promotion of Pinus Radiatus. Mark Phillips considers that isolating erosion prone areas to stop stock movement will not prevent wild animals entering, and vegetated areas with no firebreaks are a fire risk that can damage waterways which flow into Pauatahanui Inlet. The submitter further queries whether land with one cow per 2+Ha or one family and associated infrastructure to 2.5Ha is better for the environment. Considers that elimination should be the first option in controlling hazards, and that erodible areas should be removed down to the lowest river level of the property, to create a flat land with a gradual, controllable flow of water to Pauatahanui Inlet.</p> <p>Bede Crestani [S14.002] also submits on Policy P70 to remove the need to plant or retire land if the discharge is acceptable, with current discharge quality to be determined before deciding on the action to maintain or improve.</p> <p>Yvonne Weeber [S183.079] (supported by MPHRCI [FS27.079]) supports Policy P70, with no reasons stated or decision sought.</p> <p>WFF [S193.033]¹⁵ seeks for Policy P70 to be retained for all whitua.</p>

⁹ [S188.089] (supported by Forest & Bird [FS23.1245], MPGC [FS21.094] and MPHRCI [FS27.1178], opposed by NZFFA [FS9.089]) and [S188.062] (supported by Forest & Bird [FS23.1218], MPGC [FS21.067] and MPHRCI [FS27.1151], opposed by NZFFA [FS9.062])

¹⁰ [S261.088] (supported by MPHRCI [FS27.707], opposed by NZFFA [FS9.415]) and [S261.167] (supported by MPHRCI [FS27.786], opposed by NZFFA [FS9.494])

¹¹ [S183.217] (supported by MPHRCI [FS27.217]) and [S183.300] (supported by MPHRCI [FS27.300])

¹² [S193.087] (opposed by Forest & Bird [FS23.1043]) and [S193.136] (opposed by Forest & Bird [FS23.1092])

¹³ [S222.047] supported by Forest & Bird [FS23.203], supported by MPHRCI [FS27.939], opposed by NZFFA [FS9.228] and [S222.090] (supported by Forest & Bird [FS23.246] and MPHRCI [FS27.982], opposed by NZFFA [FS9.271])

¹⁴ [S288.055] (opposed by Forest & Bird [FS23.079]) and [S288.098] (opposed by Forest & Bird [FS23.122])

¹⁵ supported by Hort NZ [FS1.014] and Meridian [FS47.138], opposed by Forest & Bird [FS23.989]

	<p>Policies P71 and P72</p> <p>Yvonne Weeber¹⁶ and Guardians of the Bays¹⁷ support Policies P71 and P72, with no reasons stated or decision sought.</p> <p>Policy P73</p> <p>Bede Crestani [S14.003] submits on Policy P73, seeking for the development of water quality tests and plans to understand causes before being required to prepare Farm Environment Plans, with allowance for five years for implementation.</p> <p>Yvonne Weeber [S183.082] (supported by MPHRCI [FS27.082]) supports Policy P73, with no reasons stated or decision sought.</p> <p>Policy P74</p> <p>Yvonne Weeber [S183.083] (supported by MPHRCI [FS27.083]) supports Policy P74, with no reasons stated or decision sought.</p> <p>WFF [S193.034]¹⁸ seeks for Policy P74 to be retained for all whitua.</p> <p>Policy P76</p> <p>Yvonne Weeber [S183.084] (supported by MPHRCI [FS27.084]) supports Policy P76, with no reasons stated or decision sought.</p> <p>Rules R110, R111 and R112</p> <p>Yvonne Weeber¹⁹ is neutral on Rules R110, R111 and R112, with no reasons stated or decision sought.</p>
General/miscellaneous	<p>In several submission points, John Easter [S17.014, S17.025, S17.026, S17.027 and S17.028] seeks clarification that the costs of implementation of policies in 8.2.4 are to be funded by Council. John Easter suggests that to achieve the objectives of the plan change, provisions are required to address this anomaly whereby landowners are restricted on the use of the land by lease agreements and windfarm generators can avoid liability for diverting revenue into reforestation.</p> <p>John Boyle [S181.008] and Susan Boyle [S182.008] comment on the absence of detail on how GWRC will manage its land.</p> <p>WFF [S193.003] (opposed by Forest & Bird [FS23.959]) raises concern that “blanket” policies and rules will be implemented at property level, with severe implications for rural landowners, noting an insufficient evidence base to support the provisions. WFF [S193.005] (opposed by Forest & Bird [FS23.961]) considers there is a better way forward that the provisions proposed and that GWRC should be an “exemplar” on its own land and to other regional councils across New Zealand on partnering with landowners and rural communities to get serious about the smart data needed to inform best bang-for-buck policies that will enable it to achieve the long-term objectives.</p> <p>Isabella Cawthorn [S249.008] seeks reference to guidance for beneficial use of organic material. Melanie Rattray [S4.001] considers limited herd sizes and protecting rivers a basic first step.</p> <p>Willowbank [S204.001] generally supports the intent of amendments but is concerned that PC1 does not acknowledge the importance of rural and primary agricultural activities and the approach does not fit with s5 of the RMA.</p> <p>Pareraho Forest Trust [S213.022] seeks for Policies WH.P21 to WH.P26 to be retained as notified.</p> <p>Forest & Bird [S261.047] (supported by MPHRCI [FS27.666], opposed by NZFFA [FS9.374]) seeks for Method M44 to be amended as follows:</p>

¹⁶ [S183.080] (supported by MPHRCI [FS27.080]) and [S183.081] (supported by MPHRCI [FS27.081])

¹⁷ [S186.033] (supported by MPHRCI [FS27.456]) and [S186.034] (supported by MPHRCI [FS27.457])

¹⁸ supported by Hort NZ [FS1.015], opposed by Forest & Bird [FS23.990]

¹⁹ [S183.154] (supported by MPHRCI [FS27.154]), [S183.155] (supported by MPHRCI [FS27.155]) and [S183.156] (supported by MPHRCI [FS27.156])

	<p><i>Wellington Regional Council, working with primary sector organisations, will undertake a programme(s) to support the health of waterbodies and coastal water, including rivers, streams, wetlands, estuaries and harbours, impacted by rural activities, including to:</i></p> <p>[Add new clause:]</p> <p>(e) investigate options, including financial support and rates relief options, education, advice, and provision of plants, to encourage and enable wetland restoration</p> <p>Robert Pavis-Hall, Gaynor Rowsell, Katie Norman, Megan Norman [S273.004] seeks for contamination levels to be attributed to urbanised areas rather than farming activities.</p> <p>Alex Pfeffer [S278.002] considers restrictive regulations should be applied only when attributes have exceeded acceptable levels and these have been attributed to farming.</p>
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Issue 4a: Nutrient and E. coli management (Policies WH.P21 and WH.P22 and Policies P.P20 and P.P21)

Sub-issue(s)	Description of matters raised by submitters
General	<p>John Easther [S17.015] considers pastoral land should be measured by the area of land used for that purpose not the size of the block of land.</p> <p>Forest & Bird²⁰ consider reductions in discharges should be sought from small properties not just large properties and horticulture.</p> <p>PCC [S240.051]²¹ considers Policy P.P20 can be deleted as it unnecessarily cross references other policies. Taranaki Whānui [S286.052]²² makes a similar point with respect to Policy WH.P21.</p> <p>The Minister of Conservation [S245.035]²³ supports the intent but considers Policy P.P20 needs to be consistent with Policy 23 of the NZCPS.</p> <p>Forest & Bird²⁴ submit that stock exclusion should apply to ephemeral water courses and estuaries as they can support high ecological values.</p> <p>WFF²⁵ seek that the approach be amended to be consistent with the WIP recommendations.</p> <p>Diane Strugnell [S5.008] submits that reference to “phasing out any poor management practices” is unnecessary (Policy WHP22 and P.P21) is unnecessary as that inherent in the notion of adopting good management practice required by the same policies.</p> <p>Urban Edge Planning Group on behalf of Mangaroa Farms Ltd [S194.002, S194.005 and S194.006] take a neutral approach to the rural management policies. They submit that the PC1 rural management framework generally aligned with the regenerative farming practices undertaken and supported by Mangaroa Farms.</p> <p>Yvonne Weeber²⁶ supports the policies.</p> <p>UHCC²⁷ seeks for Policy WH.P22 to be deleted and combined with WH.P21, and seeks clarity on what is meant by “smaller farms”, as well as how the policy will be implemented and funded.</p> <p>Ian Stewart [S32.003 and S32.004] raises concern that there is insufficient evidence showing current stocking rates of small farms are directly causing adverse effects on water quality, or that nitrogen, E. coli and sediment from farming practices are a problem for water quality.</p>

²⁰ [S261.083] supported by MPHRCI [FS27.702], opposed in part by Hort NZ [FS1.043] and NZFFA [FS9.410] and [S261.163] (supported by MPHRCI [FS27.782], opposed in part by Hort NZ [FS1.066], opposed by NZFFA [FS9.490])

²¹ supported by Hort NZ [FS1.063], opposed by NZFFA [FS9.148]

²² supported by Hort NZ [FS1.041] and Rangitāne [FS24.052]

²³ supported by Forest & Bird [FS23.497], opposed by WWL [FS39.139]

²⁴ [S261.082] (supported by MPHRCI [FS27.701], opposed by NZFFA [FS9.409]) and [S261.162] (supported by MPHRCI [FS27.781], opposed by NZFFA [FS9.489])

²⁵ [S193.081] (opposed by Forest & Bird [FS23.1037]) and [S193.131] (opposed by Forest & Bird [FS23.1087])

²⁶ [S183.211] (supported by MPHRCI [FS27.211]), [S183.212] (supported by MPHRCI [FS27.212]), [S183.295] (supported by MPHRCI [FS27.295]), [S183.296] (supported by MPHRCI [FS27.296])

²⁷ [S225.083] (supported by Hort NZ [FS1.040], opposed by Forest & Bird [FS23.911]) and [S225.084] (opposed by Forest & Bird [FS23.912])

<p>E. coli (Policies WH.P21 and P.P20)</p>	<p>Terawhiti Farming [S224.008 and S224.009] , Te Kamaru Station [S229.008 and S229.009], Te Marama [S231.009], Riu Huna Farm [S39.013 and S39.014] and Mākara and Ohariu large farms [S51.008] all assert a lack of consistency between the approach proposed for E.coli with that proposed for nitrogen (in the nitrogen policies) and sediment (in policy WH.P23 and P.P22). They consider that provisions seeking reduction in E.coli should be targeted to where E.coli is shown to be an issue submitting that it is inappropriate to extrapolate results of one monitoring site and seeking farm-scale monitoring. They emphasise better understanding of sources of E. coli noting that the source of high E. coli levels in the Mākara Stream is unknown. Louise Askin [S9.015 and S9.016] makes similar points, and also seeks implementation of WIP recommendations 15 and 33.</p> <p>Fish and Game [S188.056]²⁸ supports Policy WH.P21.</p> <p>PF Olsen [S18.051] considers there is a discrepancy between rules for farming compared to forestry activities on erosion prone land and seeks for greater consistency between farming and forestry rules, including the retirement of pastoral land use in high-risk erosion land (pasture) and highest erosion-risk land (pasture).</p> <p>Willowbank [S204.003] submits on Policy P.P20 seeking clarification on how diffuse discharges will be measured at an individual property level. Willowbank [S204.004] further submits for woody vegetation to only be established where practicable.</p> <p>EDS²⁹ supports the E. coli policies.</p> <p>Diane Strugnell [S5.007] seeks for Policy P.P20 to be deleted or amended to reflect the attribute states and the actions that will retain or improve these states.</p>
<p>Nitrogen (Policies WH.P22 and P.P21)</p>	<p>Hort NZ [S12.002] (opposed by Forest & Bird [FS23.344]) does not support the approach of capping nitrogen discharges from individual properties preferring an approach of applying limits to the FMU or sub catchment scale. Hort NZ also raises an issue with whether horticulture should be regarded as intensive farming under these policies and expresses the view that fruit and vegetable growing are not intensive farming practices.</p> <p>Fish and Game [S188.057]³⁰ submits on Policy WH.P22 that a requirement to reduce “to the extent reasonably practicable” is unlikely to achieve the improvements required. Fish and Game supports strengthening of the policy with time-bound and measurable actions that will return degraded water to a state of well-being. Fish and Game [S188.086]³¹ further submits on Policy P.P21 to delete the reference to “large properties”, seeking for the reduction in diffuse discharges of nitrogen, regardless of size of property.</p> <p>WFF [S193.015] (opposed by Forest & Bird [FS23.971]) questions why reductions in N are sought when monitoring shows that river and stream surface water bodies are almost all within the NOF ‘A’ Band for nitrate toxicity and ammonia toxicity. WFF³² seeks the deletion of the nitrogen policies or replacement with text directing monitoring of periphyton at SOE sites and catchment monitoring sites.</p> <p>John Carrad [S50.001] submits that nitrogen does not come from animals, it is supplied by legumes or fertiliser. He seeks that the nitrogen leaching accounting method be upgraded.</p> <p>Willowbank [S204.005] (supported by Hort NZ [FS1.064]) seeks for the reference to “poor management practices” to be deleted due to a lack of clarity and how such practices are to be determined.</p> <p>EDS³³ seeks for Policy WH.P22 to be amended to enable controls on smaller rural properties even if they are not intensively farmed.</p> <p>PCC [S240.052] (opposed by NZFFA [FS9.149]) supports Policy P.P21.</p> <p>Taranaki Whānui [S286.053] (supported by Rangitāne [FS24.053]) supports Policy WH.P22.</p>

²⁸ supported by Forest & Bird [FS23.1212], MPGC [FS21.061] and MPHRCI [FS27.1145], opposed by NZFFA [FS9.056]

²⁹ [S222.042] (supported by Forest & Bird [FS23.198] and MPHRCI [FS27.934], opposed by NZFFA [FS9.223]) and [S222.086] (supported by Forest & Bird [FS23.242] and MPHRCI [FS27.978], opposed by NZFFA [FS9.267])

³⁰ supported by Forest & Bird [FS23.1213], MPGC [FS21.062] and MPHRCI [FS27.1146], opposed by NZFFA [FS9.057] and WWL [FS39.255]

³¹ supported by Forest & Bird [FS23.1242], MPGC [FS21.091], and MPHRCI [FS27.1175], opposed by NZFFA [FS9.086]

³² [S193.082] (opposed by Forest & Bird [FS23.1038]) and [S193.132] (opposed by Forest & Bird [FS23.1088])

³³ [S222.043] supported by Forest & Bird [FS23.199] and MPHRCI [FS27.935], opposed by Hort NZ [FS1.042] and NZFFA [FS9.224] and EDS [S222.087] (supported by Forest & Bird [FS23.243] and MPHRCI [FS27.979], opposed by Hort NZ [FS1.065] and NZFFA [FS9.268])

Issue 4B: Recognised Nitrogen Risk Assessment Tool

Sub-issue(s)	Description of matters raised by submitters
Recognised Nitrogen Risk Assessment Tool	Forest & Bird [S261.008] ³⁴ note that assessing nitrogen discharge risk is a contentious matter and questions the lawfulness of the delegation to approve the tool outside of the Schedule 1 process. Forest & Bird suggests that a plan change would be required to approve a tool for use that is not expressly referenced in the plan.

Issue 5: Small block registration (Rules 8.3.6 and 9.3.6 and Schedule 35)

Sub-issue(s)	Description of matters raised by submitters	Reference
General	<p>Akatarawa Valley Residents³⁵ object to rules targeting small blocks and what they perceive as an arbitrary stocking limit. They suggest registration is onerous and unjustified, and should be reserved for properties where there is a risk of elevated nitrate levels.</p> <p>Bob Curry [S53.001] considers “stocking limits” are arbitrary and would affect farming with significantly higher stocking rates.</p> <p>David and Pauline Innes [S234.006], Craig Innes [S277.005] and Jody Louise Sinclair, Joshua William Lowry, Anne Friedarika Sinclair & Tracey Lynn Browne [S276.012] all made general submissions objecting to “the stock number limitation” suggesting it was inappropriate, unreasonable and too low.</p> <p>WFF³⁶ does not believe that there is evidence the approach will be efficient and effective.</p> <p>PCC [S240.083] (opposed by NZFFA [FS9.180]) and UHCC³⁷ are concerned at the regulatory burden on small land owners.</p> <p>GWRC³⁸ proposes technical changes to the rules so that they focus on effective area rather than lot size.</p> <p>Louise Askin [S9.008] seeks clarification on the scope and purpose of Method M42, seeking for it to be either strengthened or removed. Louise Askin [S9.026] further questions the focus on nitrogen management on small blocks and seeks the reference to E.coli be included (but also seeks deletion of the registration requirement).</p> <p>EDS³⁹ and Forest & Bird⁴⁰ support the rules on the basis that information on land use pressures is critical to ensuring appropriate management of inputs, setting limits on resource use, and assessing effectiveness of the plan (but seeks amendment to require provision of additional information - including annual fertiliser use and average and winter stocking rates). Yvonne Weeber⁴¹, Hannah Bridget Gray (No2) Trust [S105.018] and Taranaki Whānui [S286.090] (supported by Rangitāne [FS24.090]) also support the provision.</p> <p>John Easterher [S17.012] seeks for Council to be responsible for the preparation and registration of small farm plans in consultation with the property owner.</p>	

³⁴ supported by MPHRCI [FS27.627], opposed in part by Kāinga Ora [FS45.026], opposed by Hort NZ [FS1.004] and NZFFA [FS9.335]

³⁵ John Van Nortwick & Jill Van Nortwick [S120.009 and S120.012], Karen Wallace & Mark Robbins [S121.009 and S121.012], Paul Lambert & Steph Lambert [S122.009 and S122.012], Sandy Cooper [S123.009 and S123.012], Fredrick Steensma [S124.009 and S124.012], Shoshanah Phillips [S125.009 and S125.012], Russell Judd & Cecile Judd [S126.009 and S126.012], Johanna Overdiep & Steve Sturgess [S127.009 and S127.012], Joany Grima & Allen Rockell [S128.009 and S128.012], Keith Budd & Liz Budd [S129.009 and S129.012], Pete Clark [S130.009 and S130.012], Gillian Taylor & Chris Taylor [S131.009 and S131.012], Hannah Dawson & Ryan Dawson [S132.009 and S132.012], Len Drabble [S133.009 and S133.012], Graeme Allan [S134.009 and S134.012], Joshua Wood [S135.009 and S135.012], Micayla Wood [S136.009 and S136.012], Jonathan Wood [S137.009 and S137.012], Tony Wood & Helen Wood [S138.009 and S138.012], Glenda Arnold [S139.009 and S139.012], Janet Collins [S140.009 and S140.012], George Hare [S141.009 and S141.012], Paul Arnold [S142.009 and S142.012], Chilly Brook Trust (Mary Redington) [S143.009 and S143.012], Gaylene Ward & Mike Ward [S144.009 and S144.012], Nigel Parry & Judy Parry [S145.009 and S145.012], Leanna Jackson & Carl Burns [S146.009 and S146.012], Joline Fowke & Owen Fowke [S147.009 and S147.012], Paul Baker [S148.009 and S148.012], Allan MacDonald [S149.009 and S149.012], Phyllis Strachan [S150.009 and S150.012], John Raffan & Heather Raffan [S152.009 and S152.012], Redington Family Trust (Mary Redington) [S153.009 and S153.012], Ash Barker & Kes Barker [S154.009 and S154.012], Susan Davidson [S155.009 and S155.012], John Bryce [S156.009 and S156.012], Dr Patricia Laing [S157.009 and S157.012], Erica Dawson [S158.009 and S158.012], Bruce Stevens & Theresa Stevens [S159.009 and S159.012], Dr Harold Cuffe [S160.009 and S160.012], Phil Kirycuk [S162.009 and S162.012], John Simister [S163.009 and S163.012], Sarah Purdy [S164.009 and S164.012], Dr Anna De Raadt & Roger Fairclough [S166.009 and S166.012], Allan and Sarah Kelly [S167.009 and S167.012], Barry Hearfield & Carol McGhie [S168.009 and S168.012], Karina Fraser & Grant Fraser [S170.009 and S170.012], Jessica Perno & Gavin Perno [S171.009 and S171.012], Thomas Davies [S172.009 and S172.012] and Pam Ritchie [S174.009 and S174.012]

³⁶ [S193.014] (opposed by Forest & Bird [FS23.970]), [S193.103] (opposed by Forest & Bird [FS23.1059]), [S193.152] (opposed by Forest & Bird [FS23.1108]) and [S193.183] (opposed by Forest & Bird [FS23.1139])

³⁷ [S225.012] (opposed by Forest & Bird [FS23.840]), [S225.055] (supported by Hort NZ [FS1.025], opposed by Forest & Bird [FS23.883]), [S225.110] (opposed by Forest & Bird [FS23.938]) and [S225.124] (opposed by Forest & Bird [FS23.952])

³⁸ [S238.019] (supported by Forest & Bird [FS23.322], supported in part by Hort NZ [FS1.051]) and [S238.031] (supported by Forest & Bird [FS23.334], supported in part by Hort NZ [FS1.074])

³⁹ [S222.066] (supported by Forest & Bird [FS23.222] and MPHRCI [FS27.958], opposed by NZFFA [FS9.247]), [S222.108] (supported by Forest & Bird [FS23.264] and MPHRCI [FS27.1000], opposed by NZFFA [FS9.289]) and [S222.145] (supported by Forest & Bird [FS23.301] and MPHRCI [FS27.1037], opposed by NZFFA [FS9.326])

⁴⁰ [S261.119] (supported by MPHRCI [FS27.738], opposed by NZFFA [FS9.446]), [S261.196] (supported by MPHRCI [FS27.815], opposed by NZFFA [FS9.523]) and Forest & Bird [S261.242] (supported by MPHRCI [FS27.861], opposed by NZFFA [FS9.569])

⁴¹ [S183.174] (supported by MPHRCI [FS27.174]), [S183.249] (supported by MPHRCI [FS27.249]), [S183.331] (supported by MPHRCI [FS27.331]) and Yvonne Weeber [S183.390] (supported by MPHRCI [FS27.390])

	<p>PF Olsen [S18.040, S18.067 and S18.072] considers there is preferential leniency towards farming practices over forestry activities and seeks for consistency between the rules for farming and forestry, the inclusion of the retirement of pastoral land use in high-risk erosion land (pasture) and highest erosion-risk land (pasture), and for an option to be provided for small forests.</p> <p>Megan Persico [S214.004] seeks for Method M42 to be amended so that small farm registration only applies to farms greater than 20 ha. Tim Moody [S218.002] seeks for lifestyle blocks of 4 ha to be excluded, with the minimum inclusion size being 10 ha. Robert Pavis-Hall, Gaynor Rowsell, Katie Norman, Megan Norman [S273.009] seek for the deletion of the requirement of farms of 50 ha or less to register with GWRC. Sally Kean [S57.001] considers the provisions for lifestyle blocks are not suitable for properties under 10-20 ha.</p> <p>Woodridge [S255.076] considers Rule P.R25 repeats WH.R26 and seeks for them to be combined into one rule.</p> <p>Christine Stanley [S26.006] raises concern with how titles which are part of rotational grazing or regenerative farming will be interpreted when completing the registration forms for farms smaller than 4 ha.</p> <p>CFG [S288.075] (opposed by Forest & Bird [FS23.099]) and [S288.118] (opposed by Forest & Bird [FS23.142]) seeks for data to be reviewed and the rules rewritten for consistency in an effects-based rule response, noting that there are no discharge limits as there are for forestry.</p> <p>Ian Stewart [S32.002, S32.012, S32.013, S32.014 and S32.018] raises concern that there is insufficient evidence to suggest that rural land use intensity, activities on steeper land or current stocking rates are causing adverse effects on water quality.</p> <p>Peter Thomson [S203.003] seeks for the removal of stocking rates.</p>
Information requirements	<p>Callum Forbes [S92.005], Michael Marfell-Jones [S114.004], Tracy Simms [S175.005], Sera Moran [S196.003], Kelly & Lewis Few-Mackay [S205.005], Jody Louise Sinclair, Joshua William Lowry, Anne Friedarika Sinclair & Tracey Lynn Browne [S276.014] and M. Garcia [S287.008] assert that the information requirements are extensive and complex for lay people and many landowners will not have the information or ability to collate the information.</p> <p>The concern is best summarised by Jo McCready [S94.014] who states that: <i>Land owners are required to furnish a complex range of data including average stocking rates. They are also required to calculate effective grazing areas, map the property boundaries and show waterbodies where stock exclusion is required under new rules and to show the location of fences relative to the waterbodies... there will be few in the community who will have the level of expertise required to perform the complex mathematical calculations to collate the raft of data required or produce accurate maps, especially given the undulating nature of the terrain.</i></p> <p>Upper Hutt Rural Communities⁴² raise similar concerns. David and Carolyn Gratton [S58.006] point to the cost associated with providing the required information.</p> <p>Ian Stewart [S32.019] opposes the requirements as part of a broader concern about the array of different documentary requirements for rural landowners. He seeks documentary requirements be removed “unless they are directly mandated by National directions and do not directly duplicate National Environment Standards requirements”.</p>

⁴² Bob Anker [S59.013] (opposed by MPHRCI [FS27.1262]), Darren Pettengell [S60.013] (opposed by MPHRCI [FS27.1340]), Lenard Drabble [S61.013] (opposed by MPHRCI [FS27.1509]), Jacqui Thompson [S62.013] (opposed by MPHRCI [FS27.1405]), Callum Graeme Ritchie Forbes [S63.013] (opposed by MPHRCI [FS27.1314]), Linda Forbes Williamson [S64.013] (opposed by MPHRCI [FS27.1522]), Rhiannon Forbes [S65.013] (opposed by MPHRCI [FS27.1600]), Jon-Luke Clarke Harvey [S66.013] (opposed by MPHRCI [FS27.1470]), Peter Thompson [S67.013] (opposed by MPHRCI [FS27.1574]), Gail Thomson [S68.013] (opposed by MPHRCI [FS27.1366]), Susan Patricia Boyle [S69.013] (opposed by MPHRCI [FS27.1626]), John Peter Boyle [S70.013] (opposed by MPHRCI [FS27.1457]), Brendon Allen Greig [S71.013] (opposed by MPHRCI [FS27.1288]), Angela Marie Greig [S72.013] (opposed by MPHRCI [FS27.1275]), Philip Eales [S73.013] (opposed by MPHRCI [FS27.1587]), Teresa Eales [S74.013] (opposed by MPHRCI [FS27.1639]), Lynn Marion Bialy [S75.013] (opposed by MPHRCI [FS27.1535]), Richard Charles Bialy [S76.013] (opposed by MPHRCI [FS27.1613]), JoAnn McCready [S77.013] (opposed by MPHRCI [FS27.1444]), Bob Curry [S78.013] (opposed by MPHRCI [FS27.1249]), Bob McLellan [S79.013] (opposed by MPHRCI [FS27.1236]), Bridget M Myles [S80.013] (opposed by MPHRCI [FS27.1301]), David McCready [S81.013] (opposed by MPHRCI [FS27.1353]), Meaghan Fitzgerald [S82.013] (opposed by MPHRCI [FS27.1548]), Kevin Nash [S83.013] (opposed by MPHRCI [FS27.1496]), Karen Nash [S84.013] (opposed by MPHRCI [FS27.1483]), Jennifer Sparrow [S86.013] (opposed by MPHRCI [FS27.1418]), Grant Munro [S87.013] (opposed by MPHRCI [FS27.1392]), Colleen Munro [S88.013] (opposed by MPHRCI [FS27.1327]), Joan Elizabeth Hutson [S89.013] (opposed by MPHRCI [FS27.1431]), Peter Jeffery Hutson [S90.013] (opposed by MPHRCI [FS27.1561]), Graeme Shellard [S91.013] (opposed by MPHRCI [FS27.1379])

Issue 6: Farming

Sub-issue(s)	Description of matters raised by submitters
Large blocks (Rules WH.R27 and P.R26)	<p>Akatarawa Valley Residents⁴³ express the view that there was no evidence that farming on larger properties is the cause of poor water quality. They seek exclusion of properties that are largely unproductive.</p> <p>Forest & Bird⁴⁴ seek a change to the large block rules to require the regular reporting of N fertiliser and stocking rate, submitting that this is what is required by Waikato Region’s Plan Change 1.</p> <p>Diane Strugnell [S5.012] (opposed in part by Meridian [FS47.442]) supports Rule P.R26 and seeks it be retained as notified. She notes that the small number of farms within the Whaitua contribute diversity, landscape and amenity values to Wellington area and considers it important that farming in the whaitua has continued support.</p> <p>PF Olsen [S18.041 and S18.068] considers there is preferential leniency towards farming practices over forestry activities and seeks for consistency between the rules for farming and forestry, and for the inclusion of the retirement of pastoral land use in high-risk erosion land (pasture) and highest erosion-risk land (pasture). Similarly, CFG⁴⁵ seeks for data to be reviewed and the rules rewritten for consistency in an effects-based rule response, noting that there are no discharge limits as there are for forestry.</p> <p>Yvonne Weeber⁴⁶, UHCC [S225.111] (opposed by Forest & Bird [FS23.939]) and Taranaki Whānui [S286.091] (supported by Rangitāne [FS24.091]) support the rules.</p> <p>WFF⁴⁷ seeks for the rules to be deleted, noting their relief sought for national Freshwater Farm Plans.</p> <p>Woodridge [S255.077] considers Rule P.R26 repeats WH.R27 and seeks for them to be combined into one rule.</p> <p>Ian Stewart [S32.015] raises concern that nitrogen, E. coli and sediment from farming practices are not a problem for water quality.</p>
Consents (Rules WH.R30, WH.R32, P.R27 and P.R29)	<p>EDS⁴⁸ and Forest & Bird⁴⁹ support Rules WH.R30, WH.R32, P.R27 and P.R29, suggesting they are necessary to give effect to the NPSFM. Similarly, Yvonne Weeber⁵⁰ and Taranaki Whānui⁵¹ support the provisions in principle.</p> <p>WFF⁵² consider the rules “disproportionate to any real evaluation of existing and future rural land use”. They seek the rules be deleted.</p> <p>UHCC⁵³ is concerned with affordability and achievability of the rules and seeks further consultation and the setting of realistic timeframes.</p>

⁴³ John Van Nortwick & Jill Van Nortwick [S120.013], Karen Wallace & Mark Robbins [S121.013], Paul Lambert & Steph Lambert [S122.013], Sandy Cooper [S123.013], Fredrick Steensma [S124.013], Shoshanah Phillips [S125.013], Russell Judd & Cecile Judd [S126.013], Johanna Overdiep & Steve Sturgess [S127.013], Joany Grima & Allen Rockell [S128.013], Keith Budd & Liz Budd [S129.013], Pete Clark [S130.013], Gillian Taylor & Chris Taylor [S131.013], Hannah Dawson & Ryan Dawson [S132.013], Len Drabble [S133.013], Graeme Allan [S134.013], Joshua Wood [S135.013], Micayla Wood [S136.013], Jonathan Wood [S137.013], Tony Wood & Helen Wood [S138.013], Glenda Arnold [S139.013], Janet Collins [S140.013], George Hare [S141.013], Paul Arnold [S142.013], Chilly Brook Trust (Mary Redington) [S143.013], Gaylene Ward & Mike Ward [S144.013], Nigel Parry & Judy Parry [S145.013], Leanna Jackson & Carl Burns [S146.013], Joline Fowke & Owen Fowke [S147.013], Paul Baker [S148.013], Allan MacDonald [S149.013], Phyllis Strachan [S150.013], John Raffan & Heather Raffan [S152.013], Redington Family Trust (Mary Redington) [S153.013], Ash Barker & Kes Barker [S154.013], Susan Davidson [S155.013], John Bryce [S156.013], Dr Patricia Laing [S157.013], Erica Dawson [S158.013], Bruce Stevens & Theresa Stevens [S159.013], Dr Harold Cuffe [S160.013], Phil Kirycuk [S162.013], John Simister [S163.013], Sarah Purdy [S164.013], Dr Anna De Raadt & Roger Fairclough [S166.013], Allan and Sarah Kelly [S167.013], Barry Hearfield & Carol McGhie [S168.013], Karina Fraser & Grant Fraser [S170.013], Jessica Perno & Gavin Perno [S171.013], Thomas Davies [S172.013], Pam Ritchie [S174.013]

⁴⁴ [S261.120] (supported by MPHRCI [FS27.739], opposed by NZFFA [FS9.447]) and [S261.197] (supported by MPHRCI [FS27.816], opposed by NZFFA [FS9.524])

⁴⁵ [S288.076] (opposed by Forest & Bird [FS23.100]) and [S288.119] (opposed by Forest & Bird [FS23.143])

⁴⁶ [S183.250] (supported by MPHRCI [FS27.250]) and [S183.332] (supported by MPHRCI [FS27.332])

⁴⁷ [S193.104] (opposed by Forest & Bird [FS23.1060]) and [S193.153] (opposed by Forest & Bird [FS23.1109])

⁴⁸ [S222.072] (supported by Forest & Bird [FS23.228] and MPHRCI [FS27.964], opposed by NZFFA [FS9.253]), [S222.110] (supported by Forest & Bird [FS23.266] and MPHRCI [FS27.1002], opposed by NZFFA [FS9.291]) and [S222.112] (supported by Forest & Bird [FS23.268] and MPHRCI [FS27.1004], opposed by NZFFA [FS9.293])

⁴⁹ [S261.124] (supported by MPHRCI [FS27.743], opposed in part by Meridian [FS47.304], opposed by NZFFA [FS9.451]), [S261.126] (supported by MPHRCI [FS27.745], opposed by Meridian [FS47.307] and NZFFA [FS9.453]), [S261.199] (supported by MPHRCI [FS27.818], opposed by NZFFA [FS9.526]) and [S261.201] (supported by MPHRCI [FS27.820], opposed by NZFFA [FS9.528])

⁵⁰ [S183.254] (supported by MPHRCI [FS27.254]), [S183.256] (supported by MPHRCI [FS27.256]), [S183.334] (supported by MPHRCI [FS27.334]) and [S183.336] (supported by MPHRCI [FS27.336])

⁵¹ [S286.095] (supported by Rangitāne [FS24.095], opposed in part by Meridian [FS47.305]) and [S286.097] (supported by Rangitāne [FS24.097], opposed by Meridian [FS47.308])

⁵² [S193.108] (supported in part by Meridian [FS47.301], opposed by Forest & Bird [FS23.1064]), [S193.110] (supported by Meridian [FS47.306], opposed by Forest & Bird [FS23.1066]), [S193.155] (opposed by Forest & Bird [FS23.1111]) and [S193.157] (opposed by Forest & Bird [FS23.1113])

⁵³ [S225.114] (opposed by Forest & Bird [FS23.942]) and [S225.116] (opposed by Forest & Bird [FS23.944])

	<p>Louise Askin [S9.029] and Jo McCready [S94.013] both consider that the TAS should be assessed at smaller scale/at the property level. They consider limitations should be imposed on properties only where a contaminant is shown to be a problem across the whole of the FMU. Pauatahanui Residents Association [S16.012] makes a similar point.</p> <p>CFG⁵⁴ submit that the discretionary activity rule provides for the continuation of current activities. The submitter appears to support Rule WH.R30 but opposes P.R27.</p> <p>GWRC⁵⁵ submits seeking correction of drafting errors to both WH.R30 and P.R27 by deleting the word “change”.</p> <p>Woodridge [S255.078 and S255.080] consider P.R27 repeats WH.R30 and P.R29 repeats WH.R32, seeking for each to be combined into a single rule.</p> <p>Christine Stanley [S26.018] opposes Rule P.R27 as it does not allow for individual property uses.</p>
Land use change (Policies WH.P25 and P.P24 and Rules WH.R31 and P.R28)	<p>Forest & Bird⁵⁶ support the land use change Policies WH.P25 and P.P24, but oppose Rules WH.R31 and P.R28, seeking that land use change be a non-complying activity.</p> <p>Fish and Game [S188.060]⁵⁷, EDS⁵⁸, Taranaki Whānui⁵⁹, PCC [S240.055] (opposed by NZFFA [FS9.152]) and Yvonne Weeber⁶⁰ support the provisions (both the policies and rules).</p> <p>WFF⁶¹ oppose the provisions, suggesting they are disproportionate to the reality of rural land use in the whitua.</p> <p>Willowbank [S204.007] seeks that the 4ha threshold be increased to 20ha to provide for greater flexibility.</p> <p>PF Olsen⁶² opposes the land use change provisions, considering them too restrictive with potential adverse economic effect. The submitter seeks flexibility for case-by-case evaluation with consideration of a range of criteria.</p> <p>Winstone Aggregates⁶³ seeks clarification on Policies WH.P25 and P.P25 that the approach applies to primary production and not to other rural activities (such as quarrying). Use of the term “primary production” is requested.</p> <p>CFG⁶⁴ supports Policies WH.P25 and P.P24 but opposes Rules WH.R31 P.R28 because they consider the rules could enable an increase in contaminants up to or beyond the TAS thresholds.</p> <p>Urban Edge Planning Group on behalf of Mangaroa Farms Ltd [S194.011] seek for the retention of Policy WH.P25, or for their active involvement in any changes that would result in a more restrictive framework relating to rural land use activities of Mangaroa Farms.</p> <p>UHCC⁶⁵ raises concern with the affordability and achievability for landowners and ratepayers associated with Policy WH.P25 and Rule WH.R31.</p> <p>Woodridge [S255.079] considers Rule P.R28 repeats WH.R31 and seeks they are combined into one rule.</p> <p>Ian Stewart [S32.007 and S32.008] seeks for Policy WH.P25 either to be deleted or for the area threshold to be changed from 4 ha to 10 ha, detailing raising concerns that the direction on stocking rates and land use intensity are too onerous.</p> <p>Diane Strugnell [S5.011] seeks for the amendment of Policy P.P24 to consider if there are “perverse outcomes” when managing rural land use change.</p>

⁵⁴ [S288.079] (opposed by Forest & Bird [FS23.103]) and [S288.123] (opposed by Forest & Bird [FS23.147])

⁵⁵ [S238.022] (supported by Forest & Bird [FS23.325], opposed by Meridian [FS47.302]) and [S238.034] (supported by Forest & Bird [FS23.337])

⁵⁶ [S261.086] (supported by MPHRCI [FS27.705], opposed by NZFFA [FS9.413]), [S261.125] (supported by MPHRCI [FS27.744], opposed by Hort NZ [FS1.054] and NZFFA [FS9.452]), [S261.166] (supported by MPHRCI [FS27.785], opposed by NZFFA [FS9.493]) and [S261.200] (supported by MPHRCI [FS27.819], opposed by Hort NZ [FS1.076] and NZFFA [FS9.527])

⁵⁷ supported by Forest & Bird [FS23.1216], MPGC [FS21.065] and MPHRCI [FS27.1149], opposed by NZFFA [FS9.060]

⁵⁸ [S222.071] (supported by Forest & Bird [FS23.227] and MPHRCI [FS27.963], opposed by NZFFA [FS9.252]) and [S222.111] (supported by Forest & Bird [FS23.267] and MPHRCI [FS27.1003], opposed by NZFFA [FS9.292])

⁵⁹ [S286.056] (supported by Rangitāne [FS24.056]) and [S286.096] (supported by Rangitāne [FS24.096])

⁶⁰ [S183.215] (supported by MPHRCI [FS27.215]), [S183.255] (supported by MPHRCI [FS27.255]), [S183.299] (supported by MPHRCI [FS27.299]) and [S183.335] (supported by MPHRCI [FS27.335])

⁶¹ [S193.085] (opposed by Forest & Bird [FS23.1041]), [S193.109] (supported by Hort NZ [FS1.055], opposed by Forest & Bird [FS23.1065]), [S193.135] (supported by Hort NZ [FS1.069], opposed by Forest & Bird [FS23.1091]) and [S193.156] (supported by Hort NZ [FS1.077], opposed by Forest & Bird [FS23.1112])

⁶² [S18.027] (supported by Hort NZ [FS1.046]) and [S18.053] (supported by Hort NZ [FS1.068])

⁶³ [S206.044] (supported by Enviro NZ [FS10.38]) and [S206.072]

⁶⁴ [S288.053] (opposed by Forest & Bird [FS23.077]), [S288.080] (opposed by Forest & Bird [FS23.104]), [S288.097] (opposed by Forest & Bird [FS23.121]) and [S288.120] (opposed by Forest & Bird [FS23.144])

⁶⁵ [S225.087] (supported by Hort NZ [FS1.045], opposed by Forest & Bird [FS23.915] and [S225.115] (opposed by Forest & Bird [FS23.943])

Horticulture	<p>Hort NZ⁶⁶ submits that proposed policies and rules restricting rural land use change would make crop rotation impossible and suggest that land use change should be enabled to allow for economic diversification and transition to low emission land uses. Deletion of the land use change policies is requested and replacement with a new policy that expressly provides for management of commercial vegetable production including the flexibility to undertake crop rotation multiple and/or changing properties within an FEP.</p> <p>Hort NZ⁶⁷ supports a permitted activity status for horticulture with a requirement for a FEP for activities over 5 ha under Rules WH.R27 and P.R26.</p>
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Issue 7: Stock exclusion (Policy WH.P26 and Rules WH.R28 and WH.R29)

Sub-issue(s)	Description of matters raised by submitters
General	<p>Terawhiti Farming [S224.016 and S224.017], Te Kamaru Station [S229.016 and S229.017] and Mākara and Ohariu large farms [S51.010 and S51.014] are concerned planting will not always be successful.</p> <p>Riu Huna Farm [S39.001 and S39.022], Te Marama [S231.016 and S231.017], Mākara and Ohariu large farms [S51.013] and Sharyn Hume [S95.008] are concerned about animal welfare if stock cannot access streams for drinking water.</p> <p>Ian Stewart [S32.016 and S32.017] is concerned all farms will be captured by the rules since there is no minimum size of streams also considers it is impractical and unnecessary to exclude stock on slopes greater than 10 degrees or from intermittent streams.</p> <p>UHCC [S225.113] (opposed by Forest & Bird [FS23.941]) is concerned that timeframes are unrealistic. UHCC⁶⁸ also seeks acknowledgement of pest species’ contribution to E. coli, particularly in the Mangaroa catchment.</p> <p>WFF⁶⁹ and Riu Huna Farm [S39.018] seek deletion of the rules, while other submitters seek a ‘farm-scale approach’ to the issue. Relief sought includes reliance on national stock exclusion regulations, reliance on FEPs and an exclusion of non-intensively farmed cattle. CFG⁷⁰ supports Policy WH.P26, however asserts that the rules provide inadequate protection and seeks amendment to an effects driven approach (where pastoral farming and forestry are regulated on a similar effects basis). WFF [S193.086] (opposed by Forest & Bird [FS23.1042]) further seeks for the direction of ground-truthing of bank erosion in the Makara and Mangaroa catchments, investigation of natural sources related to clarity and identification of prioritised locations/reaches for supporting riparian planting.</p> <p>Louise Askin [S9.021 and S9.028] seeks implementation of WIP recommendations 33 and 34 and a focus on non-regulatory means. She seeks that WH.R28 (b) (referring to a SSRP) should be removed.</p> <p>Yvonne Weeber⁷¹ and Taranaki Whānui⁷² support the provisions. EDS⁷³ and Forest & Bird⁷⁴ also supports the provisions and opposes submissions seeking a less stringent approach than notified. Fish and Game [S188.061]⁷⁵ supports Policy WH.P26.</p> <p>Sharyn Hume [S95.007], Terawhiti Farming [S224.013], Te Kamaru Station [S229.013] and Te Marama [S231.013] and seek that the wording of Policy WH.P26 be amended so that the wording “restrict” (in relation to livestock access to rivers) is replaced with the word “reduce”. Sue Hawkins [S44.003] seeks for the policy to be amended to manage live stock access with temporary fencing where practical, as some areas could be flood prone.</p>

⁶⁶ [S12.001], [S12.003] (opposed by Forest & Bird [FS23.345]), [S12.005] (opposed by Forest & Bird [FS23.1526]), [S12.006] (opposed by Forest & Bird [FS23.1527]), [S12.007] (opposed by Forest & Bird [FS23.1528]), [S12.009] (opposed by Forest & Bird [FS23.1530])

⁶⁷ [S12.004] (opposed by Forest & Bird [FS23.346]) and [S12.008] (opposed by Forest & Bird [FS23.1529])

⁶⁸ [S225.088] (opposed by Forest & Bird [FS23.916]) and [S225.112] (opposed by Forest & Bird [FS23.940])

⁶⁹ [S193.106] (opposed by Forest & Bird [FS23.1062]) and [S193.107] (opposed by Forest & Bird [FS23.1063])

⁷⁰ [S288.054] (opposed by Forest & Bird [FS23.078]), [S288.077] (opposed by Forest & Bird [FS23.101]) and [S288.078] (opposed by Forest & Bird [FS23.102])

⁷¹ [S183.216] (supported by MPHRCI [FS27.216]), [S183.252] (supported by MPHRCI [FS27.252]) and [S183.253] (supported by MPHRCI [FS27.253])

⁷² [S286.057] (supported by Rangitāne [FS24.057]), [S286.093] (supported by Rangitāne [FS24.093]) and [S286.094] (supported by Rangitāne [FS24.094])

⁷³ [S222.046] (supported by Forest & Bird [FS23.202] and MPHRCI [FS27.938], opposed by NZFFA [FS9.227]), [S222.068] (supported by Forest & Bird [FS23.224] and MPHRCI [FS27.960], opposed by NZFFA [FS9.249]) and [S222.069] (supported by Forest & Bird [FS23.225] and MPHRCI [FS27.961], opposed by NZFFA [FS9.250])

⁷⁴ [S261.122] (supported by MPHRCI [FS27.741], opposed by NZFFA [FS9.449]) and [S261.123] (supported by MPHRCI [FS27.742], opposed by NZFFA [FS9.450])

⁷⁵ supported by Forest & Bird [FS23.1217], MPGC [FS21.066] and MPHRCI [FS27.1150], opposed by NZFFA [FS9.061]

	<p>Wayne Robert Pettersson and Maureen Pettersson [S118.005] raise concern with the costs and practicalities of needing to fence off streams. Tracy Simms [S175.003] raise concern that fencing provisions are contrary to advice previously provided by GWRC.</p> <p>Urban Edge Planning Group on behalf of Mangaroa Farms Ltd [S194.010] seek for the retention of Policy WH.P26, or for their active involvement in any changes that would result in a more restrictive framework relating to rural land use activities of Mangaroa Farms.</p> <p>Maryanne Gill [S42.004] and Kirsty Gill [S281.003] oppose stock exclusion from waterways.</p> <p>NZFFA Wellington [S36.039] seeks for the TAS to be altered, noting the clarity test for Mangaroa is affected by the stream from a major peat swamp.</p> <p>Sally Kean [S57.002] notes that fencing requirements may increase fire risk as a result of uncontrolled shrub and grass growth.</p>
Maps	<p>Best Farm & Others [S254.023] oppose the maps and seek deletion.</p> <p>Woodridge [S255.122 and S255.123] seek amendment to the maps to allow them to be viewed a more usable scale (described as “TA District Plan style”).</p> <p>Yvonne Weeber⁷⁶ and Forest & Bird⁷⁷ support the maps.</p>
Animals to be excluded	<p>Upper Hutt Rural Communities⁷⁸, Jody Louise Sinclair, Joshua William Lowry, Anne Friedarika Sinclair & Tracey Lynn Browne [S276.013], M. Garcia [S287.007] and Jo McCready [S94.009] consider that animals other than cattle, deer and pigs are excluded from the rules and seek confirmation that that is the case. Kelly & Lewis Few-Mackay [S205.007] and Robert Pavis-Hall, Gaynor Rowswell, Katie Norman, Megan Norman [S273.003] make similar points.</p>
Setbacks	<p>EDS [S222.146]⁷⁹ and Forest & Bird⁸⁰ submit that setbacks should be required as part of stock exclusion.</p>
Small stream riparian programme (SSRP)	<p>GWRC⁸¹ seeks that a SSRP could be provided as a stand-alone plan and need not be part of the FEP where no such FEP was otherwise required.</p> <p>WFF [S193.191] (opposed by Forest & Bird [FS23.1147]) oppose the SSRP.</p> <p>Yvonne Weeber [S183.398] (supported by MPHRCI [FS27.398]) supports the SSRP.</p> <p>John Easter [S17.010] suggests separate provisions are required for working in streams within the Makara/Ohariu whitua.</p>

⁷⁶ [S183.422] (supported by MPHRCI [FS27.422]) and [S183.423] (supported by MPHRCI [FS27.423])

⁷⁷ [S261.273] (supported by MPHRCI [FS27.892], opposed by NZFFA [FS9.600]) and [S261.274] (opposed by NZFFA [FS9.601])

⁷⁸ Bob Anker [S59.012] (opposed by MPHRCI [FS27.1261]), Darren Pettengell [S60.012] (opposed by MPHRCI [FS27.1339]), Lenard Drabble [S61.012] (opposed by MPHRCI [FS27.1508]), Jacqui Thompson [S62.012] (opposed by MPHRCI [FS27.1404]), Callum Graeme Ritchie Forbes [S63.012] (opposed by MPHRCI [FS27.1313]), Linda Forbes Williamson [S64.012] (opposed by MPHRCI [FS27.1521]), Rhiannon Forbes [S65.012] (opposed by MPHRCI [FS27.1599]), Jon-Luke Clarke Harvey [S66.012] (opposed by MPHRCI [FS27.1469]), Peter Thompson [S67.012] (opposed by MPHRCI [FS27.1573]), Gail Thomson [S68.012] (opposed by MPHRCI [FS27.1365]), Susan Patricia Boyle [S69.012] (opposed by MPHRCI [FS27.1625]), John Peter Boyle [S70.012] (opposed by MPHRCI [FS27.1456]), Brendon Allen Greig [S71.012] (opposed by MPHRCI [FS27.1287]), Angela Marie Greig [S72.012] (opposed by MPHRCI [FS27.1274]), Philip Eales [S73.012] (opposed by MPHRCI [FS27.1586]), Teresa Eales [S74.012] (opposed by MPHRCI [FS27.1638]), Lynn Marion Bialy [S75.012] (opposed by MPHRCI [FS27.1534]), Richard Charles Bialy [S76.012] (opposed by MPHRCI [FS27.1612]), JoAnn McCready [S77.012] (opposed by MPHRCI [FS27.1443]), Bob Curry [S78.012] (opposed by MPHRCI [FS27.1248]), Bob McLellan [S79.012] (opposed by MPHRCI [FS27.1235]), Bridget M Myles [S80.012] (opposed by MPHRCI [FS27.1300]), David McCready [S81.012] (opposed by MPHRCI [FS27.1352]), Meaghan Fitzgerald [S82.012] (opposed by MPHRCI [FS27.1547]), Kevin Nash [S83.012] (opposed by MPHRCI [FS27.1495]), Karen Nash [S84.012] (opposed by MPHRCI [FS27.1482]), Jennifer Sparrow [S86.012] (opposed by MPHRCI [FS27.1417]), Grant Munro [S87.012] (opposed by MPHRCI [FS27.1391]), Colleen Munro [S88.012] (opposed by MPHRCI [FS27.1326]), Joan Elizabeth Hutson [S89.012] (opposed by MPHRCI [FS27.1430]), Peter Jeffery Hutson [S90.012] (opposed by MPHRCI [FS27.1560]), Graeme Shellard [S91.012] (opposed by MPHRCI [FS27.1378])

⁷⁹ supported by Forest & Bird [FS23.302] and MPHRCI [FS27.1038], opposed by NZFFA [FS9.327]

⁸⁰ [S261.249] (supported by MPHRCI [FS27.868], opposed by NZFFA [FS9.576]) and [S261.087] (supported by MPHRCI [FS27.706], opposed by NZFFA [FS9.414])

⁸¹ [S238.021] (supported by Forest & Bird [FS23.324]), [S238.036] (supported by Forest & Bird [FS23.339]) and [S238.037] (supported by Forest & Bird [FS23.340])

Issue 8: Managing erosion risk (Policies WH.P23 and P.P22, Schedule 36, Maps 90 and 93 and associated definitions)

Sub-issue(s)	Description of matters raised by submitters
General	<p>Yvonne Weeber⁸², Guardians of the Bays⁸³, Forest & Bird⁸⁴, Fish and Game⁸⁵, EDS⁸⁶ and Porirua Harbour Trust & Guardians of Pāuatāhanui Inlet [S176.013] support the approach proposed to reduce sediment.</p> <p>Te Kamaru Station [S229.012] (supported by Meridian [FS47.172]), Te Marama [S231.012] (supported by Meridian [FS47.173]), UHCC [S225.085] (opposed by Forest & Bird [FS23.913]), Riu Huna Farm [S39.015] (supported in part by Meridian [FS47.168]), John Carrad [S50.002] and Sharyn Hume [S95.006] raise concerns about the financial cost and timeframes.</p> <p>John Bowen [S117.002], WFF⁸⁷ and Kim Bowen [S103.002] disagree with the regulatory approach and prefer for non-regulatory means. Similarly, John Easter [S17.018 and S17.019] and Kirsty Gill [S281.004] consider that planting should be a Regional Council function and that compensation should be payable. WFF question whether GWRC can regulate to require planting.</p> <p>John Easter [S17.021], Ian Stewart [S32.005], Forest Enterprises [S111.004] (supported by Pukerua Holdings [FS30.058]), Wayne Robert Pettersson and Maureen Pettersson [S118.004] and M. Garcia [S287.006] generally disagree with the erosion management provisions and their necessity (due to lack of evidence on the source of sediment, while Kelly & Lewis Few-Mackay [S205.006] raise further concerns with the potential efficacy of the approach proposed. Sharyn Hume [S95.005] raises concern that the approach focuses on hillside erosion rather than other sources of sediment loss. The submitters seeks a refocus from “erosion risk” to “sediment management”. Diane Strugnell⁸⁸ expresses concern that PC1 may consider erosion risk as being associated with landslide risk rather than more subtle sediment loss and considers mapping needs to be accurate at farm scale to identify areas of high risk for sediment loss. Diane Strugnell [S5.016] (supported in part by Meridian [FS47.444]) also raises concern that Table D1 does not provide the same variation in method for addressing sediment loss.</p> <p>WFF [S193.011] (opposed by Forest & Bird [FS23.967]) submits that there is too much uncertainty and error in the dSedNet catchment load modelling to be used as a basis for policy decisions that will impact farming.</p> <p>Riu Huna Farm [S39.017] (supported in part by Meridian [FS47.169]) seeks for the removal of what a “blanket” approach and rely instead on bespoke actions.</p> <p>PF Olsen [S18.026 and S18.052] considers there is a discrepancy between rules for farming compared to forestry activities on erosion prone land and seeks for greater consistency between farming and forestry rules.</p> <p>Urban Edge Planning Group on behalf of Mangaroa Farms Ltd [S194.007] seek for the retention of Policy WH.P23, or for their active involvement in any changes that would result in a more restrictive framework relating to rural land use activities of Mangaroa Farms.</p> <p>Louise Askin⁸⁹, Sharyn Hume [S95.004], Riu Huna Farm [S39.016], Mākara and Ohariu large farms [S51.009] (supported in part by Meridian [FS47.170]), Terawhiti Farming [S224.010 and S224.011], Te Kamaru Station [S229.011] and Te Marama [S231.010 and S231.011] seek for the identification of sediment sources by using a farm-scale assessment of sediment sources rather than erosion-risk mapping, to focus on “sediment sources” and “sediment management” rather than erosion risk land/pasture.</p> <p>Forest & Bird⁹⁰ seeks for:</p> <ul style="list-style-type: none"> • “Revegetation” to be defined so that it means “woody vegetation” or “indigenous woody vegetation” • Define “not reasonably practicable” by setting out the circumstances or considerations that would make revegetation “not reasonably practicable”.

⁸² [S183.023] (supported by MPHRCI [FS27.023]), [S183.213] (supported by MPHRCI [FS27.213]), [S183.297] (supported by MPHRCI [FS27.297]), [S183.393] (supported by MPHRCI [FS27.393]), [S183.395] (supported by MPHRCI [FS27.395]) and [S183.397] (supported by MPHRCI [FS27.397])

⁸³ [S186.186] (supported by MPHRCI [FS27.609]), [S186.188] (supported by MPHRCI [FS27.611]) and [S186.189] (supported by MPHRCI [FS27.612])

⁸⁴ [S261.084] (supported by MPHRCI [FS27.703], opposed by NZFFA [FS9.411]) and [S261.164] (supported by MPHRCI [FS27.783], opposed by NZFFA [FS9.491])

⁸⁵ [S188.058] (supported by Forest & Bird [FS23.1214], MPGC [FS21.063] and MPHRCI [FS27.1147], opposed by NZFFA [FS9.058]) and [S188.087] (supported by Forest & Bird [FS23.1243], MPGC [FS21.092] and MPHRCI [FS27.1176], opposed by NZFFA [FS9.087])

⁸⁶ [S222.044] (supported by Forest & Bird [FS23.200] and MPHRCI [FS27.936], opposed by NZFFA [FS9.225]) and [S222.088] (supported by Forest & Bird [FS23.244] and MPHRCI [FS27.980], opposed by NZFFA [FS9.269])

⁸⁷ [S193.010] (opposed by Forest & Bird [FS23.966]), [S193.083] (opposed by Forest & Bird [FS23.1039]), [S193.133] (supported in part by Meridian [FS47.316], opposed by Forest & Bird [FS23.1089]), [S193.186] (opposed by Forest & Bird [FS23.1142]), [S193.188] (opposed by Forest & Bird [FS23.1144]), [S193.190] (opposed by Forest & Bird [FS23.1146]) and [S193.023] (supported by Meridian [FS47.117], opposed by Forest & Bird [FS23.979])

⁸⁸ [S5.009] and [S5.010] (supported by Meridian [FS47.314])

⁸⁹ [S9.018] (supported in part by Meridian [FS47.166]) and [S9.019]

⁹⁰ [S261.244] (supported by MPHRCI [FS27.863], opposed by NZFFA [FS9.571]), [S261.246] (supported by MPHRCI [FS27.865], opposed by NZFFA [FS9.573] and [S261.248] (supported by MPHRCI [FS27.867], opposed by NZFFA [FS9.575])

	<ul style="list-style-type: none"> • Include not increasing nitrogen loss risk above the baselines. • Provisions for critical source areas to apply across the farm and not only on high erosion risk land. <p>CFG⁹¹ seek for the provision for indigenous and exotic permanent forest, subject to controls to provide for better alternative income opportunities for farmers.</p>
Mapping erosion risk	<p>Yvonne Weeber⁹², Pareraho Forest Trust [S213.031] (opposed by Meridian [FS47.451]) and Forest & Bird⁹³ support the approach to mapping/identifying erosion risk.</p> <p>Maryanne Gill [S42.006] and WFF⁹⁴ consider the maps are not fit for purpose and the methodology used in their development is flawed. PF Olsen⁹⁵ consider there is more research available to determine landslide susceptibility. Diane Strugnell [S5.018] is concerned the mapping “doesn't take into account other sediment transport risk factors” and considered the “information in the map doesn't provide any meaningful relationship to actions to address sediment loss on highest erosion risk land”. WFF [S193.009] (opposed by Forest & Bird [FS23.965]) raises several concerns with the adequacy of the erosion risk land modelling and implications for economic costs and property rights.</p> <p>Woodridge [S255.116 and S255.119] raise concerns with the inaccuracy of the mapping when viewed at property scale. Te Kamaru Station [S229.010] considers mapping “does not correspond well with ground-truthed information on erosion from land owners”. Winstone Aggregates [S206.026] (supported by Meridian [FS47.118]) submits the mapping is too high level and unsubstantiated. Kāinga Ora⁹⁶ seeks for the maps to be deleted and a definition for “High and Highest Erosion Risk Land” to be provided to more accurately capture such sites which are then subject to the associated rules.</p> <p>Horokiwi Quarries [S2.011] (supported in part by Meridian [FS47.115]) submits that mapping of “Highest erosion risk land (Woody vegetation)” includes small areas of identified land that are incohesive and questions value of regulating small, incohesive areas of woody vegetation, given controlled activity threshold for vegetation clearance is 200 m². Horokiwi Quarries considers maps should be amended to only identify cohesive areas of woody vegetation and remove incohesive or isolated areas, with isolated areas smaller than 200 m² to be removed from the maps to be consistent with rules. Te Marama [S231.010] submits that the pixelation will force larger areas into retirement due to the need to aggregate area and work to the landscape to locate sensible fence lines. Similar points are made by Hannah Bridget Gray (No2) Trust [S105.003], S105.019 and S105.020] and Ara Poutama [S248.014 and S248.084].</p> <p>Dougal Morrison [S3.006] (supported by NZCF [FS50.035]) submits that the erosion risk land is identified on the basis of relative risk not absolute risk and that this is unhelpful. NZFFA Wellington [S36.003 and S36.004] also considers the identified risk is relative and does not address the objective risk of sediment reaching water bodies. NZFFA Wellington [S36.020]⁹⁷ seeks for a technical review of the mapping by Easton et al.</p> <p>John Easter [S17.002] (supported by Meridian [FS47.116]) considers that erosion potential of all land must be based on evidence from site investigation. John Easter [S17.016] (supported in part by Meridian [FS47.167]) also considers the maps should be labelled as indicative to assist with interpretation and not be part of the plan change.</p> <p>UHCC [S225.127] (supported by Gillies [FS11.027], opposed by Forest & Bird [FS23.955]) opposes Map 93. UHCC [S225.036] (opposed by Forest & Bird [FS23.864]) also seeks consistency with District Council hazard mapping.</p>
Establishment of woody vegetation	<p>Willowbank⁹⁸ considers it is not always possible to establish woody vegetation on pasture due to differing land qualities such as soil type, soil depth, and exposed ridgelines. Willowbank [S204.011] (supported in part by Meridian [FS47.448]) refers to the impracticalities of revegetation of non-contiguous areas.</p> <p>Donald Love⁹⁹ seeks for the removal of the mandatory requirement for 50% of permanent woody vegetation. Donald Love [S102.006] suggests there are outcomes from planting mapped land associated with soil disturbances from falling trees.</p> <p>Terawhiti Farming [S224.012] (supported by Meridian [FS47.171]) is concerned about the timeframes to transition to woody vegetation and how long it will take given difficult growing conditions. UHCC [S225.125] (opposed by Forest & Bird [FS23.953]) makes a similar point.</p>

⁹¹ [S288.052] (opposed by Forest & Bird [FS23.076]) and [S288.096] (opposed by Forest & Bird [FS23.120])

⁹² [S183.416] (supported by MPHRCI [FS27.416]) and [S183.419] (supported by MPHRCI [FS27.419])

⁹³ [S261.267] (supported by MPHRCI [FS27.886], opposed by NZFFA [FS9.594]) and [S261.270] (supported by MPHRCI [FS27.889], opposed by Meridian [FS47.453] and NZFFA [FS9.597])

⁹⁴ [S193.195] (opposed by Forest & Bird [FS23.1151]) and [S193.198] (supported in part by Meridian [FS47.450], opposed by Forest & Bird [FS23.1154])

⁹⁵ [S18.005], [S18.073] and [S18.075] (supported in part by Meridian [FS47.449])

⁹⁶ [S257.072] (supported by NZTA [FS28.104]) and [S257.075] (supported by NZTA [FS28.107], supported in part by Meridian [FS47.452])

⁹⁷ supported by Guildford Timber, Silverstream Forest and Goodwin Estate [FS25.002] and NZCF [FS50.167]

⁹⁸ [S204.010] (supported in part by Meridian [FS47.447]) and [S204.006] (supported in part by Meridian [FS47.317])

⁹⁹ [S102.001] (supported in part by Meridian [FS47.315]) and [S102.007] (supported in part by Meridian [FS47.445])

	<p>PCC [S240.053] (opposed by NZFFA [FS9.150]) and Taranaki Whānui [S286.054] (supported by Rangitāne [FS24.054]) and Hannah Bridget Gray (No2) Trust [S105.016] support the planting requirement but express a preference for planting be native and seek that such a preference be included in Policies WH.P23 and P.P22.</p> <p>Louise Askin [S9.017] (supported by Meridian [FS47.165]) submits that establishment of woody vegetation is only one option for land treatment and is a challenge to establish in exposed Mākara/Ohariu areas. Diane Strugnell [S5.017] makes a similar point noting that flexibility in solutions should be equally available for high and highest erosion risk land.</p>
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Issue 10: Farm Environment Plans (FEPs)

Sub-issue(s)	Description of matters raised by submitters
General	<p>Yvonne Weeber¹⁰⁰ supports the FEP provisions. Guardians of the Bays [S186.184] (supported by MPHRCI [FS27.607]) specifically support the certification requirements.</p> <p>Forest & Bird [S261.010]¹⁰¹ notes that PC1 provides for farming as a permitted activity provided there is an FEP. The submitter notes that additional regulation can be imposed beyond farm plans and considers it critical to regulate land use to manage cumulative effects, noting existing challenges with contaminants in the Porirua whaitua. The same submitter considers Council should be able to decline resource consent for farming activity where it is not confident the effects will be appropriately managed by a farm plan, and that a stronger activity status is required. Forest & Bird also notes that the requirement for farm plans may be confusing for plan users due to being spread across PC1 Schedule 36 and the existing NRP and suggests this could be improved. Forest & Bird [S261.011]¹⁰² also considers that farm plan “critical source area” management and small stream stock exclusion provisions need to be strengthened as to protect ephemeral watercourses.</p> <p>Fish and Game [S188.059]¹⁰³ notes the need to resource consultants to certify effective FEPs.</p> <p>WFF [S193.019] (supported in part by Hort NZ [FS1.006], opposed by Forest & Bird [FS23.975]) is concerned the term FEP is being used interchangeably with the nationally regulated FW-FP. It seeks that references to FEPs are amended to “FWFPs” for consistency, and to avoid “double-up” (two separate plans being required for the one property) and confusion. In short, the submitter considers that farm plans are already covered by national regulation and PC1 should simply rely on the national regulations taking effect independent of PC. All reference to “FEPs” in PC1, they argue, can and should be deleted. Similar submissions are made by Terawhiti Farming [S224.015] (supported by Hort NZ [FS1.053]), Te Kamaru Station [S229.015], Te Marama [S231.015], Riu Huna Farm [S39.020] and Mākara and Ohariu large farms [S51.012].</p> <p>GWRC¹⁰⁴ seeks clarification (in Rules WH.R27 and P.R26) regarding when certification of the FEP is required.</p> <p>GWRC¹⁰⁵ also seeks to remedy the omission of reference to the Small Stream Riparian Programme (SSRP) in the list of requirements that a certifier must consider. It seeks that Schedule 36 A 2 be amended to add reference to the SSRP.</p> <p>Donald Love [S102.003] (supported in part by Meridian [FS47.443]) is concerned there is no definition of “farm environment plan certifier”.</p> <p>John Carrad [S50.003] raises concerns regarding property and economic consequences due to the requirements of Schedule 36.</p> <p>Louise Askin [S9.027] seeks for the details of the rule are consistent with the content and timeframes for Freshwater Farm Plans, the removal of the requirement for a Small Stream Riparian Programme, and the retention of the inclusion of an erosion/sediment risk treatment plan.</p>
Information requirements	<p>Yvonne Weeber [S183.394] (supported by MPHRCI [FS27.394]) and Guardians of the Bays [S186.185] (supported by MPHRCI [FS27.608]) support the information requirements.</p> <p>WFF [S193.187] (opposed by Forest & Bird [FS23.1143]) oppose the requirements and seek deletion.</p> <p>Ian Stewart [S32.006 and S32.020] opposes the requirements as part of a broader concern about the array of different documentary requirements for rural landowners (which include the FEP and its various components). He seeks documentary requirements be removed “unless they are directly mandated by National directions and do not directly duplicate National Environment Standards requirements”.</p>

¹⁰⁰ [S183.214] (supported by MPHRCI [FS27.214]), [S183.391] (supported by MPHRCI [FS27.391]) and [S183.392] (supported by MPHRCI [FS27.392])

¹⁰¹ supported by MPHRCI [FS27.629], opposed by Diane Strugnell [FS12.5], Hort NZ [FS1.005] and NZFFA [FS9.337]

¹⁰² supported by MPHRCI [FS27.630], supported in part by Diane Strugnell [FS12.7], opposed by NZFFA [FS9.338]

¹⁰³ supported by Forest & Bird [FS23.1215], MPGC [FS21.064] and MPHRCI [FS27.1148], opposed by NZFFA [FS9.059]

¹⁰⁴ [S238.020] (supported by Forest & Bird [FS23.323], opposed by Hort NZ [FS1.052]) and [S238.032] (supported by Forest & Bird [FS23.335], opposed by Hort NZ [FS1.075])

¹⁰⁵ [S238.035] (supported by Forest & Bird [FS23.338]) and [S238.008] (supported by Forest & Bird [FS23.311])

	<p>Louise Askin [S9.004] (supported by Diane Strugnell [FS12.3]) considers PC1 should provide “catchment context” to inform farm plans to ensure FEPs focus on actual issues and solutions for unique landscapes and avoid regulatory by-catch from broad rules.</p> <p>Urban Edge Planning Group on behalf of Mangaroa Farms Ltd [S194.008 and S194.022] seeks for the retention of the provisions, or for their active involvement in any changes that would result in a more restrictive framework relating to rural land use activities of Mangaroa Farms.</p> <p>Pikarere Farm [S199.002] considers FEPs should be specific to the property and practical and simple to prepare, including in relation to costs.</p> <p>Willowbank [S204.009] opposes the FEP requirements due to significant costs imposed.</p> <p>Forest & Bird¹⁰⁶ seeks for the inclusion to require annual reporting of stocking rates and fertiliser use.</p>
Phasing/timeframes (Policies WH.P24 and P.P23 and Tables 8.6 and 9.5)	<p>EDS¹⁰⁷ and Forest & Bird¹⁰⁸ support the phase-in tables but seek that Policies WH.P24 and P.P23 be amended so that phasing takes into account deposited sediment.</p> <p>WFF¹⁰⁹ opposes the dates for FEPs in Tables 8.6 and 9.5 because FWFPs are not required to be prepared by these dates as part of the national roll-out. It doubts the specified dates will be achievable. WFF¹¹⁰ seeks for the deletion of the provisions as farm plans are already covered by national regulation.</p> <p>Yvonne Weeber¹¹¹, Fish and Game [S188.088]¹¹², PCC [S240.054] (opposed by NZFFA [FS9.151]) and Taranaki Whānui¹¹³ support the policies and specific dates. UHCC [S225.086] (opposed by Forest & Bird [FS23.914]) supports the Policy WH.P24 in principle but considers the dates are overly ambitious given the number of landowners in the catchment. It seeks the dates by which the last FEPs are required be pushed be out until 2032.</p> <p>Pareraho Forest Trust [S213.025] seek amendment to bring forward that date by which FEPs in the move the Korokoro Stream catchment are required to 30 December 2025.</p> <p>GWRC [S238.033] (supported by Forest & Bird [FS23.336]) submitted that the dates be amended so that phasing is timed to align with the national roll out of FWFPs. Louise Askin [S9.020] makes a similar submission and also seeks implementation of WIP recommendation 34.</p> <p>PF Olsen [S18.042 and S18.069] considers there is preferential leniency towards farming practices over forestry activities and seeks for Tables 8.6 and 9.5 to be deleted.</p>

Issue 11: Definitions

Sub-issue(s)	Description of matters raised by submitters
Intensive grazing	<p>Yvonne Weeber [S183.028] (supported by MPHRCI [FS27.028]) supports the definition.</p> <p>Forest & Bird [S261.017] (supported by MPHRCI [FS27.636], opposed by NZFFA [FS9.344]) submit that the definition should be set out in full rather than by reference as proposed.</p>
Erosion risk treatment plan	<p>The definition is supported by Yvonne Weeber [S183.017] (supported by MPHRCI [FS27.017]), Guardians of the Bays [S186.011] (supported by MPHRCI [FS27.434]) and UHCC [S225.034] (opposed by Forest & Bird [FS23.862]).</p>
High erosion risk land (pasture)	<p>UHCC [S225.037] (opposed by Forest & Bird [FS23.865]) and John Easterher [S17.003] (supported by Meridian [FS47.119]) both seek amendment but both submissions seek amendment the mapping rather than the definition itself.</p>

¹⁰⁶ [S261.243] (supported by MPHRCI [FS27.862], opposed by NZFFA [FS9.570]) and [S261.245] (supported by MPHRCI [FS27.864], opposed by NZFFA [FS9.572])

¹⁰⁷ [S222.045] (supported by Forest & Bird [FS23.201] and MPHRCI [FS27.937], opposed by NZFFA [FS9.226]), [S222.067] (supported by Forest & Bird [FS23.223] and MPHRCI [FS27.959], opposed by NZFFA [FS9.248]), [S222.089] (supported by Forest & Bird [FS23.245] and MPHRCI [FS27.981], opposed by NZFFA [FS9.270]) and [S222.109] (supported by Forest & Bird [FS23.265] and MPHRCI [FS27.1001], opposed by NZFFA [FS9.290])

¹⁰⁸ [S261.085] (supported by MPHRCI [FS27.704], opposed by NZFFA [FS9.412]), [S261.121] (supported by MPHRCI [FS27.740], opposed by NZFFA [FS9.448]), [S261.165] (supported by MPHRCI [FS27.784], opposed by NZFFA [FS9.492]) and [S261.198] (supported by MPHRCI [FS27.817], opposed by NZFFA [FS9.525])

¹⁰⁹ [S193.105] (opposed by Forest & Bird [FS23.1061])and [S193.154] (opposed by Forest & Bird [FS23.1110])

¹¹⁰ [S193.084] (supported by Hort NZ [FS1.044], opposed by Forest & Bird [FS23.1040]), [S193.134] (supported by Hort NZ [FS1.067], opposed by Forest & Bird [FS23.1090]), [S193.184] (supported by Hort NZ [FS1.079], supported in part by Meridian [FS47.446], opposed by Forest & Bird [FS23.1140]) and [S193.185] (opposed by Forest & Bird [FS23.1141])

¹¹¹ [S183.251] (supported by MPHRCI [FS27.251]), [S183.298] (supported by MPHRCI [FS27.298]), [S183.333] (supported by MPHRCI [FS27.333])

¹¹² supported by Forest & Bird [FS23.1244], MPGC [FS21.093] and MPHRCI [FS27.1177], opposed by NZFFA [FS9.088]

¹¹³ [S286.055] (supported by Rangitāne [FS24.055]) and [S286.092] (supported by Rangitāne [FS24.092])

	WFF [S193.024] (supported by Meridian [FS47.120], opposed by Forest & Bird [FS23.980]) seeks the definition be deleted, suggesting it is not fit for purpose. Again, it appears the concern relates to the mapping rather than the definition itself.
	Yvonne Weeber [S183.024] (supported by MPHRCI [FS27.024]) supports the definition.
Drain	UHCC [S225.019] ¹¹⁴ seeks amendment to “the proposed definition of a ‘drain’ that would result in all drains being considered modified streams”.
Nitrogen discharge risk	Yvonne Weeber [S183.032] (supported by MPHRCI [FS27.032]) supports the definition. GWRC [S238.005] (supported by Forest & Bird [FS23.308]) submitted to correct a minor wording error in the definition of “nitrogen discharge risk”. This amendment would simply add the word “nitrogen’ to be consistent with the defined term “recognised nitrogen risk assessment tool”. Forest & Bird [S261.019] (supported by MPHRCI [FS27.638], opposed by NZFFA [FS9.346]) submit that there must be consideration of biophysical factors influencing nitrogen loss, and the sensitivity of the receiving environment to that nitrogen loss and propose an amendment to the definition to include that point.
Recognised Nitrogen Risk Assessment Tool	The definition is supported by Yvonne Weeber [S183.035] (supported by MPHRCI [FS27.035]) and sought to be amended by GWRC [S238.006] (supported by Forest & Bird [FS23.309]) to address the same minor wording omission discussed above. Forest & Bird [S261.020] ¹¹⁵ opposes the definition noting contention with the efficacy of nitrogen risk assessment tools. Forest & Bird considers there a gap from the lack of reference to a widely acceptable tool. It considers it inappropriate to delegate councils the ability to approve a tool. The submitter proposes wording that removes that reference to the RNRAT being approved for use by the GWRC and replaces that with reference to a tool “that has been included in the plan using a plan change or variation”.
Registration	Yvonne Weeber [S183.037] (supported by MPHRCI [FS27.037]) supports the definition of “Registration”.
River and river bed	Akatarawa Valley Residents ¹¹⁶ , John and Jacqueline Diggins [S250.003], Robert Pavis-Hall, Gaynor Rowswell, Katie Norman, Megan Norman [S273.005], M. Garcia [S287.011] and Callum Forbes [S92.004] seek a definition (including a picture) and description of how a 1 m wide water course is measured. Kelly & Lewis Few-Mackay [S205.003] and Jody Louise Sinclair, Joshua William Lowry, Anne Friedarika Sinclair & Tracey Lynn Browne [S276.009] note that there are a number of references to small rivers, less than 1 metre wide but are concerned there is an open-definition for the minimum small river size. Jo McCready [S94.008] similarly submits that PC1 does not state what the minimum size of a river is and considers that unacceptable. Heather Phillips [S212.006] is concerned about a lack of definition of “river bed”.
Sacrifice paddocks and effective hectares	Sue Hawkins [S44.002] seeks an independent review of the definition of “sacrifice paddocks”, raising concern about the financial implications of sacrificing paddocks and the practicalities of fencing off rivers due to the nature of the land. Forest & Bird [S261.022] (supported by MPHRCI [FS27.641], opposed by NZFFA [FS9.349]) seeks for the definition of sacrifice paddock to be set out in full. Yvonne Weeber ¹¹⁷ supports the definition of both sacrifice paddock and effective hectares.
Small stream riparian programme	Upper Hutt Rural Communities ¹¹⁸ submit on the definition of small stream riparian programme (SSRP) questioning what the minimum distance of a small stream is. They seek that the definition be clarified so that this is clear.

¹¹⁴ supported by Gillies [FS11.009] and Pukerua Holdings [FS30.009], opposed by Forest & Bird [FS23.847], with a neutral/not stated stance from NZTA [FS28.124]

¹¹⁵ supported by MPHRCI [FS27.639], opposed in part by WIAL [FS31.009], opposed by Hort NZ [FS1.010] and NZFFA [FS9.347]

¹¹⁶ John Van Nortwick & Jill Van Nortwick [S120.004], Karen Wallace & Mark Robbins [S121.004], Paul Lambert & Steph Lambert [S122.004], Sandy Cooper [S123.004], Fredrick Steensma [S124.004], Shoshanah Phillips [S125.004], Russell Judd & Cecile Judd [S126.004], Johanna Overdiep & Steve Sturgess [S127.004], Joany Grima & Allen Rockell [S128.004], Keith Budd & Liz Budd [S129.004], Pete Clark [S130.004], Gillian Taylor & Chris Taylor [S131.004], Hannah Dawson & Ryan Dawson [S132.004], Len Drabble [S133.004], Graeme Allan [S134.004], Joshua Wood [S135.004], Micayla Wood [S136.004], Jonathan Wood [S137.004], Tony Wood & Helen Wood [S138.004], Glenda Arnold [S139.004], Janet Collins [S140.004], George Hare [S141.004], Paul Arnold [S142.004], Chilly Brook Trust (Mary Redington) [S143.004], Gaylene Ward & Mike Ward [S144.004], Nigel Parry & Judy Parry [S145.004], Leanna Jackson & Carl Burns [S146.004], Joline Fowke & Owen Fowke [S147.004], Paul Baker [S148.004], Allan MacDonald [S149.004], Phyllis Strachan [S150.004], John Raffan & Heather Raffan [S152.004], Redington Family Trust (Mary Redington) [S153.004], Ash Barker & Kes Barker [S154.004], Susan Davidson [S155.004], John Bryce [S156.004], Dr Patricia Laing [S157.004], Erica Dawson [S158.004], Bruce Stevens & Theresa Stevens [S159.004], Dr Harold Cuffe [S160.004], Phil Kirycuk [S162.004], John Simister [S163.004], Sarah Purdy [S164.004], Dr Anna De Raadt & Roger Fairclough [S166.004], Allan and Sarah Kelly [S167.004], Barry Hearfield & Carol McGhie [S168.004], Karina Fraser & Grant Fraser [S170.004], Jessica Perno & Gavin Perno [S171.004], Thomas Davies [S172.004] and Pam Ritchie [S174.004]

¹¹⁷ [S183.014] (supported by MPHRCI [FS27.014]) and [S183.040] (supported by MPHRCI [FS27.040])

¹¹⁸ Bob Anker [S59.009] (opposed by MPHRCI [FS27.1258]), Darren Pettengell [S60.009] (opposed by MPHRCI [FS27.1336]), Lenard Drabble [S61.009] (opposed by MPHRCI [FS27.1505]), Jacqui Thompson [S62.009] (opposed by MPHRCI [FS27.1401]), Callum Graeme Ritchie Forbes [S63.009] (opposed by MPHRCI [FS27.1310]), Linda Forbes Williamson [S64.009] (opposed by MPHRCI [FS27.1518]), Rhiannon Forbes [S65.009] (opposed by MPHRCI [FS27.1596]), Jon-Luke Clarke Harvey [S66.009] (opposed by MPHRCI [FS27.1466]), Peter Thompson [S67.009] (opposed by MPHRCI [FS27.1570]), Gail Thomson [S68.009] (opposed by MPHRCI [FS27.1362]), Susan Patricia Boyle [S69.009] (opposed by MPHRCI [FS27.1622]), John Peter Boyle [S70.009] (opposed by MPHRCI [FS27.1453]), Brendon Allen Greig [S71.009] (opposed by MPHRCI [FS27.1284]), Angela Marie Greig [S72.009] (opposed by MPHRCI [FS27.1271]), Philip Eales [S73.009] (opposed by MPHRCI [FS27.1583]), Teresa Eales [S74.009] (opposed by MPHRCI [FS27.1635]), Lynn Marion Bialy [S75.009] (opposed by MPHRCI [FS27.1531]), Richard Charles Bialy [S76.009] (opposed by MPHRCI [FS27.1609]), JoAnn McCready [S77.009] (opposed by

	Yvonne Weeber [S183.041] (supported by MPHRCI [FS27.041]) supports the definition.
Stock unit	<p>Lindsay Jenkin [S11.001] submits that smaller animals (certain breeds) are not comparable to regular sized farm animals in terms of stock unit. The submitter seeks amendment to recognise animals/breeds typical on small block and use of a weight range calculation.</p> <p>UHCC [S225.047] (opposed by Forest & Bird [FS23.875]) expresses concern that there is no consistent stock unit numbers used across New Zealand and that any departure from numbers used in other regions needs to be justified. The submitters also consider it easier for landowners and managers if stock units were simplified to recognise these numbers will change as stock age.</p> <p>The definition is supported by Yvonne Weeber [S183.049] (supported by MPHRCI [FS27.049]) and Forest & Bird [S261.024] (supported by MPHRCI [FS27.643], opposed by NZFFA [FS9.351])</p>
Stocking Rates: stocking rate, winter stocking rate and annual stocking rate	<p>Yvonne Weeber¹¹⁹ and Forest & Bird¹²⁰ support all three definitions of stocking rate, winter stocking rate and annual stocking rate.</p> <p>WFF [S193.027] (opposed by Forest & Bird [FS23.983]) seek amendment to the definition of “stocking rate” so that it refers to the average number of stock units in a 12 month period rather than the highest number at any time in that period.</p>

MPHRCI [FS27.1440]), Bob Curry [S78.009] (opposed by MPHRCI [FS27.1245]), Bob McLellan [S79.009] (opposed by MPHRCI [FS27.1232]), Bridget M Myles [S80.009] (opposed by MPHRCI [FS27.1297]), David McCready [S81.009] (opposed by MPHRCI [FS27.1349]), Meaghan Fitzgerald [S82.009] (opposed by MPHRCI [FS27.1544]), Kevin Nash [S83.009] (opposed by MPHRCI [FS27.1492]), Karen Nash [S84.009] (opposed by MPHRCI [FS27.1479]), Jennifer Sparrow [S86.009] (opposed by MPHRCI [FS27.1414]), Grant Munro [S87.009] (opposed by MPHRCI [FS27.1388]), Colleen Munro [S88.009] (opposed by MPHRCI [FS27.1323]), Joan Elizabeth Hutson [S89.009] (opposed by MPHRCI [FS27.1427]), Peter Jeffery Hutson [S90.009] (opposed by MPHRCI [FS27.1557]), Graeme Shellard [S91.009] (opposed by MPHRCI [FS27.1375])

¹¹⁹ [S183.007] (supported by MPHRCI [FS27.007]), [S183.048] (supported by MPHRCI [FS27.048]) and [S183.055] (supported by MPHRCI [FS27.055])

¹²⁰ [S261.013] (supported by MPHRCI [FS27.632], opposed by NZFFA [FS9.340]), [S261.023] (supported by MPHRCI [FS27.642], opposed by NZFFA [FS9.350]) and [S261.026] (supported by MPHRCI [FS27.645], opposed by NZFFA [FS9.353])