Further Submission on Proposed Regional Plan Change 1 and Variation 1 of Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments

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I am a person who has an interest in the proposal that is greater than the interest the general public has. My reasons are I reside on a lifestyle property within the area affected by Proposed Plan Change 1.

I wish to speak at the hearing in support of my further submission.

Please find attached to this email my further submission (17 pages)

Please also note I have reverted to my maiden name Linton. My original submission is under the name Sally Millar ID: 73067. Please amend all future correspondence to Sally Linton.

If you have any questions regarding this further submission, please do not hesitate to contact me.

Sally Linton

17 September 2018

Submitter	Submission Point	Support/Oppose	Reason
Auckland/Waikato Fish and Game Submitter ID: 74085	PC1-11003	Oppose	Lack of definition on what is disturbed land. Does not allow for other mitigations. Contrary to the intent of the RMA and PC1 and no assessment of the impact of the receiving environment.
Department of Conservation Submitter ID: 71759	PC1-11054	Oppose	In particular oppose the proposal to exclude stock from ephemeral waterbodies as would severely impact farm management systems. Further any discharges from ephemeral systems can be adequately managed prior to entering a permanent water body if necessary.
Federated Farmers of New Zealand Submitter ID: 74191	PC1-10844	Support in Part	Support the deletion of 3.11.5.2(4) (c) as the rule is arbitrary and blunt as areas can be appropriately grazed with no impacts that increase the discharge of contaminants to water.
Gleeson, Graeme B Submitter ID: 73800	PC1-6410	Support in Part	Support that Good Management Practices as recognised by industry should be adopted. GMP's can be different for each industry and need to be used to ensure effective and sustainable outcomes Support that FEP's be tailored to each farm or enterprises individual approach Support that FEP's mitigations to each contaminant are relevant to each farm rather than a blanket approach
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10618	Support	Support that all properties irrespective of size meet the permitted baseline standard of 3.11.5.1 should be a permitted activity
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8423	Oppose	Oppose as the proposed amendments would mean that nearly all land under 4.1 ha would require a resource consent eg the proposed amendment seeks that to be a permitted activity under 3.11.5.1 would need more than 2ha to graze one horse which is 12 stock units.
Waikato Regional Council Submitter ID: 72890	PC1-3115	Support	Provides clarity and certainty to the provisions
Waipa District Council Submitter ID: 67704	PC1-3167	Support	Support clarity around lease arrangements is required. eg Cambridge Jockey Club that leases stable areas to trainers.
Alcock and Easton, Jo and John Submitter ID:73374	PC1-9218	Support in Part	Support the proposal in part. In particular to ensure there's is sufficient flexibility and recognition of different farming systems including equine.
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6192	Support in part	Support the amendment to increase the slope where grazing may occur as a permitted activity to 23 degrees

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Auckland/Waikato Fish and Game Submitter ID: 74085	PC1-10997	Oppose and support	Oppose the deletion of 3.11.5.2(4)(b)(i) and limiting nitrogen contaminant loss to 15kg/N/ha/yr to be a permitted activity as far too restrictive given nitrogen is one of 4 contaminants and in many subcatchments is not the primary contaminant of concern. Support the deletion of 3.11.5.2(4)(c)
Balance Agri-Nutrients Limited Submitter ID: 74036	PC1-6901	Support in part	Support that there should be flexibility in the grazing of slopes greater than 15 degrees as a permitted activity where any contaminant losses are managed and prevented from entering waterbodies
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10621	Support	Support that there should be flexibility in the grazing of slopes greater than 15 degrees as a permitted activity where any contaminant losses are managed and prevented from entering waterbodies
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10492	Oppose	Oppose limiting nitrogen loss calculations to the grazed area rather than the total area of the property.
Moerangi Trust Submitter ID: 73111	PC1-4275	Support	Support the proposed amendments
Pinnell, Graham Submitter ID: 74007	PC1-4422	Support	Support the use of BMP to manage nitrogen leaching
Primary Land Users Group Submitter ID: 71427	PC1-11173	Support	Support amending the slope restriction so that grazing over 23 degrees is only restricted where break feeding occurs
Taupo Lake Care Incorporated Submitter ID: 61093	PC1-9355	Support	Support the removal of the NRP and the use of Overseer from Rule 3.11.5.2 as many of the properties between 4.1 and 20ha will be equine and lifestyle blocks using stock classes that Overseer has not been developed for and does not work.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8425	Oppose	Oppose that the land use provisions are restricted to 22 October 2016. For thoroughbred breeding farms that do not stand their own stallion, all mares will be off the property at stud farms standing stallions. The provision as proposed would mean they are unable to bring their mares and foals back to the property without getting a resource consent even though they comply with all other aspects of 3.11.5.2. Stocking rate should be an annualised average. Also oppose that non compliance defaults to a non-complying rule.

Submitter	Submission Point	Support/Oppose	Reason
Waikato Regional Council Submitter ID: 72890	PC1-3117	Support in part	Support the amendments that provide clarity and certainty. Seek that for the proposed amendment to 3.11.5.2(4)(b)(ii) that any intensity proxy consideration is given to stock classes other than sheep, cattle and deer as this property size is often lifestyle or equine and horses in particular graze and use land in a manner that is significantly different.
Advisory Committee on Regional Environment (ACRE) Submitter ID: 71238	PC1-11208	Oppose in Part	Oppose the use of Overseer in cases where Overseer has been shown to be highly unreliable if it provides a result at all, in particular for equine properties.
Auckland/Waikato Fish and Game Submitter ID: 74085	PC1-10999	Oppose	Oppose the submitters proposal to focus on nitrogen. Nitrogen is only one of four contaminants and in many cases is not the contaminant causal to water quality degradation
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10500	Oppose in Part	Oppose the use of Overseer in cases where Overseer has been shown to be highly unreliable if it provides a result at all, in particular for equine properties.
Hancock Forest Management NZ(Ltd) Submitter ID: 73724	PC1-5774	Support in Part Oppose in Part	Support the proposal that farming activities be permitted subject to meeting Best Practicable Option. Oppose including minimum standards as a blunt tool and removes applying mitigations most suited to the issues to be addressed and farm management practices of the different sectors eg dairy and thoroughbred studs
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8113	Oppose	Oppose submission unless consideration is given to having Best Management Practices and standards that are reflective of stock classes other than sheep cattle and deer such as equine which have significantly different grazing and land use patterns.
Pinnell, Graham Submitter ID: 74007	PC1-4374	Support in Part	Support that PC1 needs to focus on all four contaminants not just nitrogen Support the recognition of experimental learning and adaptive management especially for those stock classes where there has been limited research in relation to environmental impacts such as equine.
Strang and Strang Limited Submitter ID: 73851	PC1-5571	Support in Part Oppose in Part	Support the proposal that farming activities be permitted subject to meeting Best Practicable Option. Oppose including minimum standards as a blunt tool and removes applying mitigations most suited to the issues to be addressed and farm management practices of the different sectors eg dairy and thoroughbred studs

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The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8208	Oppose	Oppose that non-compliance with 3.11.5.4 is a non-complying activity rather than restricted discretionary
Verry, Brigid Submitter ID: 73095	PC1-7718	Support	Support that landowners under 20ha that do not comply with 3.11.5.2 have the option of complying with 3.11.5.4 rather than automatically defaulting to 3.11.5.6 Restricted Discretionary
Waikato Regional Council Submitter ID: 72890	PC1-3420	Oppose in Part Support in Part	Oppose the use of Overseer in cases where Overseer has been shown to be highly unreliable if it provides a result at all, in particular for equine properties Support that the NRP is a yardstick to indicate relative loss on N(trend) However this appears inconsistent with proposed provision that N loss is not to exceed the NRP Support that can reassign NRP entitlements when new land is incorporated into a property. However, appears inconsistent with the proposal to remove the ability that a NRP can be held by an enterprise and can only exist in association with a particular parcel or property. Consider that if an enterprise has all its parcels within a subcatchment that it should be able to hold a single NRP.
Auckland/Waikato Fish and Game Submitter ID: 74085	PC1: 11001	Oppose	Oppose proposal for 3.11.5.6 to be non-complying activity. Retain restricted discretionary.
Department of Conservation Submitter ID: 71759	PC1-11058	Support	Support the submission
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10506	Oppose	Oppose the submission to make 3.11.5.6 a discretionary activity as this allows consideration of other matters not related to PC1. Retain restricted discretionary activity status and consider amending matters of discretion if it can be shown there are valid omissions for consideration.
Ravensdown Limited Submitter ID: 74058	PC1-10156	Support	Support the submission

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Auckland/Waikato Fish and Game Submitter ID: 74085	PC1-11002	Oppose	We do not consider notification is necessary and will only serve to delay decisions and increase costs for parties and not improve the environmental outcome
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6867	Support	Support Rule 3.11.5.7 being a discretionary activity
DairyNZ Submitter ID: 74050	PC1-10247	Support in Part	Support the advice note. However, consider in such cases where contaminant discharges will not increase should be a discretionary activity
Department of Conservation Submitter ID: 71759	PC1-11059	Oppose	Oppose any consideration of 3.11.5.7 being a prohibited activity as provides no avenue for consideration of land use changes where there is no increase in contaminants or will provide decreases in contaminant discharges.
Ravensdown Limited Submitter ID: 74058	PC1-10161	Support in Part	Support that 3.11.5.7 is limited to where land use change will result in an increase of contaminant discharges. However, will need consequential amendment to 3.11.5.6 or a new rule that allow for land use change where the contaminant discharge will decrease or remain at the same level as the existing activity.
Waikato Regional Council Submitter ID: 72890	PC1-3480	Support in Part	Support the amendment to exclude land use change within a property or enterprise.
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6915	Support	Support, in particular clarification required in regards what registration information is to be updated and how frequently
Department of Conservation Submitter ID: 71759	PC1-6334	Oppose in part	Oppose the proposal to up date information every 6 months. This needs only to be done when there is a significant change in land use or change of ownership of land
Oji Fibre Solutions (NZ) Limited Submitter ID: 73725	PC1-8740	Support	Support the submission that information to be collected is to be the preceding year. By the time collection of information for Schedule A is required could well be four or more years since 2016 and for lifestyle blocks, in particular there could have been more than one change of ownership. Also, in smaller blocks record keeping is unlikely to be adequate to provide accurate historical information and therefore the data would not be at all accurate.
The Royal Forest and Bird Protection Society of	PC1-8449	Oppose	Oppose as Schedule A is about registration and gathering information. Other provisions in PC1 determine actions that are required to be undertaken if

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New Zealand Incorporated Submitter ID: 74122			necessary. Also consider that information gathered should be for the year preceding the registration date rather than 22 October 2016.
Waikato Regional Council Submitter ID: 72890	PC1-3536	Oppose in part	Oppose the submission that registration should only occur on properties over 4.1ha on the basis that if actions is going to be required by properties between 2 and 4ha in future plan changes that registration is a necessary first step in better understanding what activities are undertaken on the properties and also is a toll for initial engagement.
Ballance Agri-Nutrients Limited Submitter ID: 74036	PC1-6570	Support in Part	Support the provisions for those stock classes where Overseer will provide a valid NRP. However, needs to identify how the requirement to produce an NRP will be managed for stock classes or activities for which Overseer will not provide a valid number such as horses.
Bolt Trust, King Country Partnership 2013 LP and Lone Pine Trust Submitter ID: 73539	PC1-6467	Support in Part	Support the submission re goat farming cannot be currently modelled using Overseer. Need to include other similar stock classes such as horses which also cannot be validly modelled by Overseer.
DairyNZ Submitter ID: 74050	PC1-10254	Oppose in Part	Oppose as needs to recognise that there are some stock classes that cannot be validly modelled using Overseer such as horses.
Fonterra Co-operative Group Ltd Submitter ID: 74057	PC1-10517	Oppose in Part	Oppose as needs to recognise that there are some stock classes that cannot be validly modelled using Overseer such as horses.
Horticulture New Zealand (HortNZ) Submitter ID: 73801	PC1-10190	Support in Part	Support the need for alternatives to the Overseer model for land uses where Overseer will not provide a valid result such as horses.
Mathis, Mary-Ann Submitter ID: 72833	PC1-5695	Support in Part	Support the need for alternatives to the Overseer model for land uses where Overseer will not provide a valid result such as horses.
Pukekohe Vegetable Growers Association Inc (PVGA) Submitter ID: 74220	PC1-9841	Support in Part	Support the need for alternatives to the Overseer model for land uses where Overseer will not provide a valid result such as horses. Also support a better recognition on the limitations of using Overseer as a regulatory tool
Ravensdown Limited Submitter ID: 74085	PC1-10165	Oppose in Part	Need to recognise that Overseer is not a suitable model for some systems such as equine.
Waikato Dairy Leaders Group	PC1-3119	Oppose	Need to recognise that Overseer is not a suitable model for some systems such as equine.

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Submitter ID: 73418			
Waikato Regional Council Submitter ID: 72890	PC1-3553	Oppose Oppose in Part Support	Oppose the submission to remove the ability for an enterprise to hold a NRP. Alternatively amend so that only enterprises that land parcels are in the same catchment can hold a NRP. Support that the NRP only needs to be approved by a CFNA Oppose in part to amend highest annual leaching loss to a single financial year as this does not provide clarity with the financial year being dependent on the business structure and operation. Oppose as need to recognise that Overseer is not a suitable model for some systems such as equine.
Bolt Trust, King Country Partnership 2013 LP and Lone Pine Trust Submitter ID: 73539	PC1-6466	Support	Support submission in particular clarification that different farming systems are treated differently noting they have different impact on the receiving environment and management practices eg equine.
Department of Conservation Submitter ID: 71759	PC1-11055	Oppose	Sheep are not included in PC1 controls regarding exclusion from water bodies as sheep do not actively enter water. Oppose the increased mandatory setback and inclusion of intermittent waterbodies to Schedule C. If specific critical risks can be shown this will be addressed in the FEP process
Pamu Farms of New Zealand Submitter ID: 74000	PC1-5821	Oppose	Oppose the requirement so that it applies to ephemeral streams and wet seepages. For smaller properties such a requirement is likely to make management of that property no viable and consider contaminants arising can be managed by other means such as at the point of entering a permanent waterbody, if required.
Pinnell, Graham Submitter ID: 74007	PC1-4378	Support	Support submission as reasonable and practical to achieve the outcome sought.
Raukawa Charitable trust Submitter ID: 74073	PC1-10589	Support in Part	Support the submission to the extent it provides clarity to the provision
Waikato Regional Council Submitter ID: 72890	PC1-3571	Support	Support the submission to the extent it provides clarity to the provision. Support consistency with Schedule 1
Ata Rangi 2015 Limited Partnership Submitter ID: 74045	PC1-6239	Support in Part	Support seeking greater certainty. However, that certainty needs to reflect that it provides for different mitigation requirement for different sectors eg equine.

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Ballance Agri-Nutrients Limited Submitter ID: 67834	PC1-7105	Support in Part	Support to provide flexibility and managed in accordance with Good Management Practices but GMP's need to be appropriate to each sector eg equine.
Beef + Lamb New Zealand Limited Submitter ID: 73369	PC1 - 11508	Support in Part	Support to provide flexibility and managed in accordance with Good Management Practices but GMP's need to be appropriate to each sector eg equine.
Department of Conservation Submitter ID: 71759	PC1-10647	Oppose	Oppose the prosed increase of setbacks. The FEP provides for an assessment of risks which may or may not require increased setbacks depending on the situation. Oppose the requirement so that it applies to intermittent and ephemeral waterbodies. For smaller properties such a requirement is likely to make management of that property no viable and consider contaminants arising can be managed by other means through the FEP process.
Fertiliser Association of New Zealand Submitter ID: 73305	PC1-10650	Support Oppose in Part	Support the submission except that in the management of nitrogen loss another mechanism other than Overseer needs to be provided for sectors such as equine where it has been shown that Overseer does not provide a valid result.
Hancock Forest Management (NZ) Ltd Submitter ID: 73724	PC1-5789	Oppose	Oppose the requirement that BPO's to be implemented immediately and timing needs to reflect the environmental risk and the costs of implementation. Oppose the inclusion and expansion of specific actions to be undertaken as undermines the integrity of a FEP that is to provide for flexibility and to include actions that a the most effective and efficient for that property. Also need to recognise actions are also likely to be sector specific such as equine.
The Royal Forest and Bird Protection Society of New Zealand Incorporated Submitter ID: 74122	PC1-8201	Oppose	Oppose to require reductions in all cases, specifically where that contaminant is not an issue, and/or the land use is already undertaking GMP. Oppose the inclusion and expansion of specific actions to be undertaken as undermines the integrity of a FEP that is to provide for flexibility and to include actions that a the most effective and efficient for that property. Also need to recognise actions are also likely to be sector specific such as equine. Oppose the mandatory inclusion of matters in the FEP that do not relate to PC1, notwithstanding that a land owner may include such matters if they so choose.

Submitter	Submission Point	Support/Oppose	Reason
Waikato Regional Council Submitter ID: 72890	PC1-3575	Oppose in Part Support in Part	Support deletion of minimum standards in PC1 or the amendment to reflect the standards as BMP rather than firm requirements. Oppose the use of Oversee unless there is provision for other methods for sectors such as equine where it is shown that Overseer does not provide a valid result. Oppose the deletion of "unless other suitable mitigations are specified.
Wairakei Pastoral Ltd Submitter ID: 74095	PC1-11389	Support in Part	Support the inclusion of other models other than Overseer to determine NRP and nutrient budgets but needs to be expanded to include other mechanisms or proxy's where it can be shown that current models are not suitable for a particular sector such as equine.
Auckland/Waikato Fish and Game Submitter ID: 74085	V1PC1-1548	Oppose	Oppose the submission. Oppose that ephemeral streams be included in PC1 Oppose that all wetlands be specifically listed not just significant wetlands Oppose that game bird values be specifically included over and above general recreational values. Consideration of natural values is outside the scope of PC1
Beef and Lamb New Zealand Limited Submitter ID: 73369	V1PC1-1707	Support in part	Support taking a holistic approach to discharges rather than a single activity focus.
Department of Conservation Submitter ID: 71759	V1PC1-1698	Oppose in Part	Oppose the submission Oppose the submission to have greater regulation in PC1 Oppose that Whangamarino wetland have a separate FMU Oppose the introduction of an allocation regime in PC1.
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-788	Oppose	Oppose that low emitters as per Rule 3.11.5.2 over 20ha will be required to submit a FEP albeit simplified when the identified risks of discharges are low.
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-801	Support in Part	Support the recognition that for some farm types, in particular equine, Overseer is not a suitable model. However, in developing the Nitrogen Risk Scorecard as an alternative need to recognise that different assessments/proxy's will be required for different farm types. If NRS is to proceed input from industry stakeholders will be required.

Submitter	Submission Point	Support/Oppose	Reason
New Zealand Thoroughbred breeders Association Submitter ID: 82030	V1PC1-118	Support	Support the submission as there is lack of consideration in PC1 of the impact of the equine sector on the environment and whether the controls are reasonable and equitable. Further research is required before inclusion.
New Zealand Trainers Association Submitter ID: 81968	V1PC1-128	Support	Support the submission as there is lack of consideration in PC1 of the impact of the equine sector on the environment and whether the controls are reasonable and equitable. Further research is required before inclusion.
Wentwood Grange Submitter ID: 81978	V1PC1-73	Support	Support the submission as there is lack of consideration in PC1 of the impact of the equine sector on the environment and whether the controls are reasonable and equitable. Further research is required before inclusion.
Windsor Park Stud Submitter ID: 81976	V1PC1-72	Support	Support the submission as there is lack of consideration in PC1 of the impact of the equine sector on the environment and whether the controls are reasonable and equitable. Further research is required before inclusion.
Beef and Lamb New Zealand Limited Submitter ID: 73369	V1PC1-1657	Support	Support the proposal to have Objective 1 recognising and providing for the Values identified in 3.11.1
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-122	Support	Support the proposed amendments including the recognition of maintenance where it can be shown the water quality already meets the desired values
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-126	Support	Support the amendments to Objective 2 as proposed by the submitter
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1361	Support	Support the amendments to Objective 2 as proposed by the submitter
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1362	Support in Part	Support but requires further clarification that the actions being completed in 10 years to improve water quality by 10 percent may require a longer timeframe to be reflected in an actual 10 percent improvement
Theland Tahi Farm Group Limited Submitter ID: 82022	V1PC1-490	Support in Part	Support but requires further clarification that the actions being completed in 10 years to improve water quality by 10 percent may require a longer timeframe to be reflected in an actual 10 percent improvement
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-143	Support	Support the proposed amendments in particular providing for flexibility in the implementation of on farm management measures.

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Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-172	Support	Support the proposed amendments in particular that the actions are tailored and designed to fit the specific circumstances of the farming enterprise such as equine.
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-162	Support in Part	Support but seek further clarity on Most Practicable Actions and its application.
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-164	Support in Part	Support but seek further clarity on Most Practicable Actions and its application.
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-748	Support in Part	Support but seek further information on the Nitrogen Risk Scorecard and the development of proxies that would be suitable for equine enterprises
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1348	Support in Part	Support the proposed amendments to Policy 4 for properties that make a minor contribution to the contaminant load.
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1365	Support	Support the proposed amendments for the reasons given by the submitter
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1349	Support	Support the proposed amendments for the reasons given by the submitter
Waikato Regional Council Submitter ID: 72890	V1PC1-1503	Support	Support the proposed amendments for the reasons given by the submitter
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1353	Support	Support the proposed amendments, in particular further research that will provide a greater understanding of discharges from equine properties.
Auckland/Waikato Fish and Game Submitter ID: 74085	V1PC1-1544	Oppose	Oppose the initiation of an allocation framework to be implemented in this Plan Change as there is insufficient information available to do so. A primary aim of this Plan Change is to gather more robust and detailed information of what is happening on land in the catchment to enable better decision making in future plan changes that may or may not require an allocation regime
Raukawa Charitable Trust Submitter ID: 74073	V1PC1-1253	Support	Support the implementation of a decision support system if it assists in better use of resources and effective outcomes
Federated Farmers of New Zealand	V1PC1-259	Support in Part	Support in part especially the recognition of flexibility required for FEP's including sector differences.

Submitter	Submission Point	Support/Oppose	Reason
Submitter ID: 74191			
Raukawa Charitable Trust Submitter ID: 74073	V1PC1-1256	Oppose in Part	Oppose that WRC will specify the range of mitigations as this will limit the opportunity for the use of mitigations not identified but provide equal or better outcomes especially in sector as that council has given little consideration of eg the equine sector. Consider any listing of mitigations by council should be guidance only.
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-294	Support	Support for the reasons given by the submitter
Auckland/Waikato Fish and Game Submitter ID: 74085	VC1PC1-1574	Oppose	Oppose the introduction of allocation in this Plan Change. A primary aim of this Plan Change is to gather more robust and detailed information of what is happening on land in the catchment to enable better decision making in future plan changes that may or may not require an allocation regime
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-295	Support	Support the proposed amendments to remove the inference that an allocation regime will be introduced. A primary aim of this Plan Change is to gather more robust and detailed information of what is happening on land in the catchment to enable better decision making in future plan changes that may or may not require an allocation regime
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-300	Support	Support the proposed amendments to remove the inference that an allocation regime will be introduced. The use of further tools and mechanisms including allocation to manage contaminant losses to water can only be determined after the information that is being gathered through this Plan Change has been analysed.
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-308	Support	Support that monitoring and evaluation to include all sources on contaminants to water.
Federated Farmers of New Zealand Submitter ID: 74191	VC1PC1-312	Support	Support the inclusion of collaboration and consultation with industry and stakeholders and that it should include stakeholders in the equine sector.
Auckland/Waikato Fish and Game Submitter ID: 74085	V1PC1-1582	Oppose	Oppose the introduction of prohibited activity status for discharge of sediment and consider the proposal unworkable.

Submitter	Submission Point	Support/Oppose	Reason
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-762	Oppose	While agree that the 6 SU is arbitrary the proposal to limit to less that 25% of feed imported onto the property will be difficult if not impossible to calculate on lifestyle properties with most small block owners having no idea of pasture growth or feed utilisation. Further for equine lifestyle most of the feed imported would be grain based mixed feeds that would be particularly difficult to calculate as per the proposal. This would create a significant cost by requiring professional assistance to ensure compliance.
Waikato Regional Council Submitter ID: 72890	V1PC1-214	Support	Support for the reasons given
Waikato Regional Council Submitter ID: 72890	V1PC1-1513	Support	Support proposals as provide clarification to the intent of the Rule
Department of Conservation Submitter ID: 71759	V1PC1-418	Oppose	Oppose as not practical to enforce Rule that is still open to challenge
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-765	Oppose Oppose in Part Support in Part	Oppose the proposal to limit to less than 25% of feed imported onto the property, for properties less than 20 ha, will be difficult if not impossible to calculate on lifestyle properties with most small block owners having no idea of pasture growth or feed utilisation. Further for equine lifestyle most of the feed imported would be grain based mixed feeds that would be particularly difficult to calculate as per the proposal. This would create a significant cost by requiring professional assistance to ensure compliance. Oppose the introduction of a maximum stocking rate for properties over 20ha as well providing a NRP. Further it is unlikely that any equine property would comply with the stocking rate requirement. Support in part the proposal to introduce a Nitrogen Risk Scorecard (NRS) as an alternative to providing a NRP. It has been shown that Overseer does not currently work for equine properties and a NRS could be an appropriate alternative. However, support is conditional on appropriate proxies for equine properties being able to be developed. Oppose the introduction of FEPs for properties for rule 3.11.5.2 as essentially makes the compliance requirements the same as for rules 3.11.4.3 and 3.11.5.4 and 3.11.5.2 was for properties that have been identified as being lower risk and therefore require less scrutiny.

Submitter	Submission Point	Support/Oppose	Reason
Waikato Regional Council Submitter ID: 72890	V1PC1-1514	Support in Part	Support the proposed amendments providing greater clarity to the intent or the rule Support in part the deletion of the 15kg/N/yr requirement and substitution with a proxy. However, request that the development of the proxy has stakeholder input especially equine to ensure that the requirements are appropriate. Support the change to an annualised stocking rate rather than a point in time
Auckland/Waikato Fish and Game and Eastern Region Fish and Game Submitter ID: 74085	V1PC1-1578	Oppose	Oppose the introduction of targets in relation to N losses when there is currently insufficient information available to do so. Further N is only one of four identified contaminants for the Waikato and Waipa Rivers and for most subcatchments the science has clearly shown that N is not the limiting factor
Beef and Lamb New Zealand Limited Submitter ID: 73369	V1PC1-1664	Support in Part	Support the proposal to amend to tailor mitigation to critical source identification and management, noting that sectors such as equine will have different issues and management to other pastoral sectors. Support the proposal that consents have a duration of 35 years Support the use of the Best Practicable option noting that these may be different for the different sectors
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-788	Support in Part	Support in part the proposal to introduce a Nitrogen Risk Scorecard (NRS) as an alternative to providing a NRP. It has been shown that Overseer does not currently work for equine properties and a NRS could be an appropriate alternative. However, support is conditional on appropriate proxy's for equine properties being able to be developed.
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1725	Support in Part Oppose in Part	Oppose the reduction to 3 year rolling average nitrogen leaching value. Support in part so long as there is appropriate reflection of the different requirements for the different sectors including equine.
Waikato Regional Council Submitter ID: 72890	V1PC1-1516	Support Oppose	Support the amendments which provide greater clarity to the Rule intent Support the ability to re assign the NRP when land is incorporated into new property Oppose the deletion of "unless other suitable mitigations are specified" from 3.11.5.4(iii) as removes undermines the ability for a subcatchment approach or edge of field solutions

Submitter	Submission Point	Support/Oppose	Reason
			Oppose the proposal for an enterprise to be able to hold a NRP and limit to only specific parcel or property
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-572	Support Support in Part	Support the proposals in particular "the relative contribution of the industry sector" and the "characteristics of the subcatchment" Seek clarity as to the intent of adding new paragraph (vii)
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1351	Support in part Oppose in Part	Support the proposal to make the land use change Rule a discretionary activity however oppose the deletion of 3.11.5.6 Restricted discretionary activity
Waikato Regional Council Submitter ID: 72890	V1PC1-1519	Support in Part	Support the proposal to exclude changes of land use that occur within properties
Waikato Regional Council Submitter ID: 72890	V1PC1-1520	Oppose	Oppose to limit registration to properties over 4.1ha and exclude properties between 2 and 4.1 ha. If it is considered that in the next plan change properties between 2 and 4.1ha are going to be required to have controls to minimise contaminants to water, they should be required to register in this plan change. This be a first step in engagement with the landowners of such properties and also provide Council with a greater understanding of how this land is managed and used. If registration is to be undertaken online as proposed the requirement of registration of these properties will have minimal cost impact within the total cost of implementing Plan Change 1.
Waikato Regional Council Submitter ID: 72890	ViPC1-1494	Oppose in part Support in part	Oppose the proposal for an enterprise to be able to hold a NRP and limit to only specific parcel or property Support that the NRP only needs to be approved by a CFNA rather than being calculated by a CFNA
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-717	Oppose	Oppose the reliance on Overseer for all land uses. It has been shown that for some land uses and in particular equine that Overseer does not work. An alternative tool is required if nitrogen losses is to be calculated form equine properties.
Fonterra Co-operative Group Ltd Submitter ID: 74057	V1PC1-1369	Oppose	Oppose the reliance on Overseer for all land uses. It has been shown that for some land uses and in particular equine that Overseer does not work. An alternative tool is required if nitrogen losses is to be calculated form equine properties.

Submitter	Submission Point	Support/Oppose	Reason
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-758	Support in Part Oppose in Part	Support the proposed exclusion where a FEP provides alternative mitigations Oppose that exclusions over 18 stock units must be setback 1m rather than only for new fences.
Beef and Lamb New Zealand Limited Submitter ID: 73369	V1PC1-1689	Support	Support limiting to key critical source areas
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-766	Support in Part Oppose in Part	Oppose the definition of Most Practicable Option as do not consider it creates any greater clarity or certainty of intent Support the recognition of the relative contribution of the industry sector that the farm enterprise belongs Support in part the amendments to FEP requirements as long as there is an appropriate reflection of different sectors practices including the equine sector
Waikato Regional Council Submitter ID: 72890	V1PC1-1537	Support	Support the deletion of some of the minimum standards or amendment of the minimum standards to best management practice
Beef and Lamb New Zealand Limited Submitter ID: 73369	V1PC1-1724	Support	Support the amendments to the glossary in regard to effective exclusion. In particular to include temporary fencing.
Fonterra Co-operative Group Ltd Submitter ID: 74057	ViPC1-816	Oppose	Oppose the use of stocking rate in relation to horses in particular as a proxy for environmental impacts. Stocking rates were initially developed for sheep to identify the carrying capacity of various land types. This has been extrapolated to apply to other stock classes. However, for cattle and deer there have been field validation and adjustments made but there has been no validation of the extrapolation for horses. We therefore question using stocking rate for horses with no validation that a horse is a xx equivalent of a sheep in terms of carrying capacity and then extrapolating that stocking rate is a fair proxy for intensity of horses.
Raukawa Charitable Trust Submitter ID:74073	V1PC1-1272	Oppose	Oppose the inclusion for a definition of intermittently flowing river in that PC1 controls only relate to continually flowing waterbodies
Waikato Regional Council Submitter ID: 72890	V1PC1-230	Support	Support the proposed amendments by the submitter
Federated Farmers of New Zealand Submitter ID: 74191	V1PC1-800	Support	Support the amendment to the definition Good Management Practice to include the term manage

Submitter	Submission Point	Support/Oppose	Reason
Waikato Regional Council Submitter ID: 72890	V1PC1-1532	Oppose in Part	Oppose the proposed amendment that the NRP be calculated using the current version Overseer. Overseer has been shown not to work for equine properties so requires an alternative method, or removal of equine properties from the requiring a NRP until such time Overseer has been amended and validated for equine properties
Waikato Regional Council Submitter ID: 72890	V1PC1-1535	oppose	Oppose the use of stocking rate in relation to horses in particular as a proxy for environmental impacts. Stocking rates were initially developed for sheep to identify the carrying capacity of various land types. This has been extrapolated to apply to other stock classes. However, for cattle and deer there have been field validation and adjustments made but there has been no validation of the extrapolation for horses. We therefore question using stocking rate for horses with no validation that a horse is a xx equivalent of a sheep in terms of carrying capacity and then extrapolating that stocking rate is a fair proxy for intensity of horses.