

**SUBMISSION ON THE PROPOSED PLAN CHANGE 10 (LAKE  
ROTOTUA NUTRIENT MANAGEMENT) TO THE BOP REGIONAL  
WATER & LAND PLAN**

**To:** The Chief Executive  
Bay of Plenty Regional Council  
PO Box 364  
Whakatāne 3158

**Submission on:** The Proposed Plan Change 10 (Lake Rotorua Nutrient  
Management) to the BOP Regional Water & Land Plan

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**1. The specific provisions of the proposed plan change that Ravensdown's submission relates to are:**

The Proposed Plan Change 10 (Lake Rotorua Nutrient Management) as included in the attached submission below.

**2. Trade Competition**

Ravensdown could not gain an advantage in trade competition through this submission. Ravensdown's submission does not relate to trade competition or the effects of trade competition.

**3. Ravensdown's submission is:**

Refer to submission points below. The relief sought by Ravensdown are also outlined in the submission points below.

**4. Ravensdown wishes to be heard in support of this submission.**

Ravensdown would be prepared to present a joint case with others that have made similar submissions at a hearing.



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Chris Hansen  
Authorised Agent for Ravensdown Limited  
27 April 2016

# **SUBMISSION ON PROPOSED PLAN CHANGE 10 (LAKE ROTORUA NUTRIENT MANAGEMENT) TO THE BOP REGIONAL WATER & LAND PLAN**

## **1 Introduction**

The following submission is made on behalf of Ravensdown Limited (Ravensdown) to Proposed Plan Change 10 (Lake Rotorua Nutrient Management) (Proposed PC10) to the BOP Regional Water & Land Plan (RW&LP).

Ravensdown takes an interest in regional plans from two perspectives – how plan provisions affect their own manufacture and storage activities (there are no stores within the area covered by Proposed PC10) and how the plan provisions may affect the users of their products. When considering plans Ravensdown wishes to ensure planning provisions are enabling and are not unduly restrictive.

In this context, Ravensdown is mindful that the purpose of the Resource Management Act 1991 (RMA) is to promote the sustainable management of natural and physical resources, while achieving a number of outcomes, including avoiding, remedying or mitigating the actual or potential adverse environmental effects of an activity. Ravensdown therefore seeks for plans to recognise that the RMA enables activities and anticipates environmental effects will occur, so long as these effects are managed to levels considered acceptable by the community. The RMA does not anticipate no development or zero effects from activities.

Ravensdown's submission is divided into two parts: Part I provides some general comments on Proposed PC10 and provides comment on the key matters of concern. Part II provides specific comment on the Proposed PC10 provisions, and the amendments sought by Ravensdown to address the key matters of concern addressed in Part I.

Ravensdown has been involved extensively in regional plans throughout New Zealand and has been involved in different processes in different regions. Ravensdown has found it particularly helpful where councils have entered into pre-hearing meetings or mediation with submitters, to explore submission points and identified possible agreed solutions prior to hearings. This has meant only matters that are outstanding proceed to hearings, and the time and effort (and costs) involved in attending hearings is minimised.

The Auckland Unitary Plan process is a case in point, where Council provides a marked-up version of the plan provisions based on their review of submissions. This marked up version is then used in mediation with an Independent Mediator where parties review the Council's suggested amendments, and any further amendments that are agreed through the mediation. A formal record of the mediation is circulated to all parties. The agreed marked up version then becomes the basis of the Council Officer evidence which addresses the outstanding matters.

Ravensdown would highly recommend Environment Bay of Plenty adopt such an approach to submissions on the Proposed PC10.

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## **2 Part I - General Comment on the Proposed PC10**

### **2.1 General Support**

Ravensdown generally supports the intent of Proposed PC10 to meet the requirements of the Regional Policy Statement (RPS), and the overall approach adopted subject to amendments to address the matters raised in this submission.

In particular, Ravensdown supports:

- The intention to reduce the nitrogen load into Lake Rotorua from a variety of sources to achieve the 2032 sustainable lake load required by the RPS;
- The determination of individual Nutrient Discharge Allowances that must be achieved by 2032;
- The allowance of authorised transfer of nitrogen loss entitlements between properties/farming enterprises from 1 July 2022;
- The intention of finishing the limit setting process, in relation to water quality and quantity, by 2023;
- The use of property/farming enterprise specific Management Plans and reliance on good management practices;
- The enabling nature of a number of the policies and rules, including a range of permitted activities and the use of controlled activities;
- The use of OVERSEER to estimate the nitrogen losses from land.

### **2.2 Matters Need Addressing**

Notwithstanding the matters supported above, the following matters have been identified by Ravensdown as needing addressing in the Proposed PC10.

#### Complexity and Clarity

Ravensdown considers that overall rule regime is overly complex and confusing. There are a range of reasons for this complexity and confusion including:

- The inconsistent use OVERSEER versions;
  - The benchmarking approach;
  - Restrictions on transferring nitrogen losses;
  - Not requiring property/farm enterprises to reduce its nitrogen loss below the bottom of the relevant sector nitrogen loss range; and
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- The level of detail included in the rules.

A number of these matters are discussed below or addressed in the submission points on particular provisions in Part II below.

#### Managing Nutrient Losses

Ravensdown notes Proposed PC 10 provisions intend to manage nutrient losses “*onto or from land*”. Ravensdown opposes the intention to manage nitrogen inputs. Ravensdown considers the focus should be on the loss of nitrogen from the land. Nitrogen inputs can be managed through implementing good management practices for nutrient management, including compliance with the Code of Practice for Fertiliser Use.

#### Inconsistent use of OVERSEER versions

Ravensdown notes Proposed PC 10 uses OVERSEER 5.4 to determine the Integrated Framework annual catchment loads and reductions and pastoral farming sector proportional reductions, but uses OVERSEER 6.2.0 to determine sector contributions and nitrogen discharge allowances. The use of OVERSEER 5.4 is a concern as these values will be dated and may relate to properties now sold or operating differently now. Furthermore, OVERSEER 6.2.0 has also been updated and once the version is updated, it is no longer available for use. Ravensdown does not consider it is appropriate to have the fundamental building block of the approach in Proposed PC 10, the Integrated Framework, being based on OVERSEER 5.4 which is now redundant, and it is not appropriate to identify one version of OVERSEER (such as for compliance). A plan change will be required when OVERSEER versions change and are no longer available for use.

#### OVERSEER Reference Files

Ravensdown is concerned how OVERSEER reference files are used within Proposed PC 10. As well as potential ownership of the files and privacy issues, Ravensdown is concerned that the reference files will change with versions of OVERSEER and as land use changes. Ravensdown would prefer to keep OVERSEER reference files outside of the plan provisions, as Environment Canterbury (ECan) has recently done with its Plan Change 3. In that case, everything associated with the reference file has been kept outside of the plan, and Plan Change 3 includes a schedule that outlines the methodology to be used when changes to OVERSEER results in a change in reference files.

#### Reference to Good Management Practices (GMP)

Ravensdown strongly supports the adoption of Good Management Practices (GMP) in every land and water regional it submits on. GMP is a relevant and effective method that results in nutrient management at the farm level that assists with achieving the water quality outcomes sought for the catchment or region. While Policy WL 6B (a) intends the use of GMP (it uses the term ‘*on-farm best management practice*’) Ravensdown is concerned that GMP has not been brought through into the plan provisions including the policies and rules. Currently only Method LR M5(e) and a definition refer to good/best management practice.

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### Standard Management Plan Term

While Ravensdown accepts that Bay of Plenty Regional Council is entitled to use any term it wishes to when referring to a management plan, Ravensdown considers the term Nitrogen Management Plan does not reflect what the intention of the management plan is, which includes managing phosphorous (Schedule LR Six; B 5 (b)). Ravensdown prefers the term Nutrient Management Plan that reflects much better the intent of the management plan, which is more than just managing nitrogen. This term has been adopted by regional councils in other regional plans.

### Reference to Schedule LR Seven

Ravensdown is concerned that there is a lack of reference to Schedule LR Seven in the policies and rules that would assist to provide guidance as to how Nitrogen Discharge Allowances and Managed Reduction Offsets are implemented (such as in the permitted activity rules).

### Restrictions on the Transfer of Nitrogen Losses

Ravensdown is not clear on what the permitted activity condition *'There is no transfer of nitrogen loss entitlement either to or from the property/farming enterprise'* is trying to address, apart from Policy LR P7 which suggests the reason is to encourage efficient outcomes. It appears as if the plan intends to place a moratorium on any transfer of loss entitlement between properties until 2022 when transfer will be a controlled activity. By default, a non-complying activity consent is required under Rule LR R12. Such an approach is not an effects based and is not directed by the RPS provisions. It is considered that the transfer of loss entitlement should be a discretionary activity until 2022 when it is a controlled activity.

### Activity Status

Ravensdown is concerned that the default rule for permitted activity Rule LR R1 and the controlled activity rules is non-complying activity status for activities that do not comply with the permitted or controlled activity standards Rule LR R12. This default rule is overly onerous and not appropriate for some activities that only breach one permitted or controlled activity standard. Ravensdown considers restricted discretionary activity is appropriate in such a case, with the council restricting its discretion to the permitted or controlled activity standard that is breached.

### Benchmarking

Ravensdown considers the benchmarking provisions are confusing. In particular, it is not clear from Schedule LR One (Table LR 5) how a benchmark under the previous Rule 11 was developed; what time period or modelling was used (presumably an older OVERSEER version); and therefore the relevance as a starting point questionable and may be meaningless. Ravensdown considers this is an important matter as it leads on to the determining the percentage reduction required and then the activity status for particular activities. Ravensdown also considers a new clear policy regarding benchmarking is required.

Ravensdown would recommend Council take a revised approach to benchmarking for the next 5 years as opposed to reliance on an historical benchmark, now over ten years old, with questionable

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relevance to nitrogen losses under the current version of OVERSEER. This would allow for actual nutrient losses to be measured from a farm system meaning the benchmark can be determined from recent actual results and the percentage reduction required can be based on real not predicted values.

To address the above matters Ravensdown has sought a number of amendments to specific provisions discussed in Part II below with the intention of ensuring the wording provides clarity and avoids confusion with any interpretation, and considers these amendments assist the Proposed PC 10 to meet the purpose of the Resource Management Act 1991 (RMA) being to promote the sustainable management of natural and physical resources.

### **3 Part II - Specific Submission Points**

In addition to the general submission points made above, a number of requested changes to provisions are set out below. However, Ravensdown's submission and relief sought are not restricted to the specific words used. While suggesting possible amendments to wording, Ravensdown generally seeks such other or alternative wording for the provisions it seeks changes to which would properly address the concerns raised in this submission.

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#	Page #	Reference	Support/ Oppose	Decision Sought	Reason
1	2	Introduction – adaptive management approach; integrated programme	Support	Ravensdown seeks for Council to retain the overall approach outlined in the Introduction.	Overall the approach is considered appropriate and will assist to achieve the water quality outcomes sought by RPS.
2	2	Table LR 2- Pastoral farming sector proportional reductions	Oppose in part	Ravensdown seeks for Council to: <ul style="list-style-type: none"> <li>• Update Table LR 2 using latest version of OVERSEER;</li> <li>• Include in the Note a need to update when OVERSEER updated;</li> <li>• Delete the reference to a particular version of OVERSEER used.</li> </ul>	While Ravensdown does not question the proportional reductions proposed, it is concerned that an old version of OVERSEER has been used to determine these figures. Ravensdown considers this is an important building block for the Integrated Framework developed in Proposed PC 10, and the figures may be inaccurate for use as proposed. As discussed in Part I above, Ravensdown considers any reference to a particular version of OVERSEER is inappropriate.
3	3	Table LR 3 – Sector contributions	Oppose in part	Ravensdown seeks for Council to: <ul style="list-style-type: none"> <li>• Be consistency in its use of OVERSEER;</li> <li>• Delete reference to a particular version of OVERSEER used;</li> <li>• Provide for a mechanism for updating when OVERSEER changes without having to undertake a plan change (as per ECan Plan Change 3).</li> </ul>	Ravensdown is concerned that OVERSEER 5.4 has been used to determine the proportional reductions in Table LR 2, and OVERSEER 6.2.0 has been used to determine the sector contributions in Table LR 3. Ravensdown considers consistency in which version of OVERSEER is used is required. Ravensdown also considers it is not appropriate to lock one version of OVERSEER into the plan, and a mechanism should be included to address when OVERSEER is updated in future without a plan change.
4	5	Policy LR P1	Oppose in part/support in part	Ravensdown seeks for Council to: <ul style="list-style-type: none"> <li>• Re-write Policy LR P1 to include an action plan for implementation and a</li> </ul>	Ravensdown considers Policy LR P1 is written as an aspirational Objective rather than a policy. The current wording does not provide action plan for implementing an objective or a timeframe. Ravensdown supports the intent to reduce nitrogen

				<p>timeframe;</p> <ul style="list-style-type: none"> <li>Retain the intent to reduce nitrogen losses from land and to monitor the ongoing target.</li> </ul>	losses from land and the monitoring of the 2032 target.
5	5	Policy LR P2	Support in part	<p>Ravensdown seeks for Council to:</p> <ul style="list-style-type: none"> <li>Retain the intent of the Policy LR P2;</li> <li>Re-name the management plan to a Nutrient Management Plan;</li> <li>Amend the policy to read: <i>“implementation of <u>good</u> management practices”</i></li> </ul>	Ravensdown supports the intent to manage phosphorus through the use of management plans. However, as discussed in Part I above, it considers the management plan proposed in Clause (iii) should be called a Nutrient Management Plan to properly reflect its purpose. Ravensdown also considers the policy should be amended to read <i>“implementation of <u>good</u> management practices”</i> .
5	5	Policy LR P3	Support in part	<p>Ravensdown seeks for Council to:</p> <ul style="list-style-type: none"> <li>Retain the intent of Policy LR P3;</li> <li>Provide for updates to the starting position and end point nitrogen load to Lake Rotorua using the best available science;</li> <li>Delete reference to a particular version of OVERSEER used;</li> <li>Provide for a mechanism for updating when OVERSEER changes without having to undertake a plan change (as per ECan Plan Change 3).</li> </ul>	<p>While Ravensdown supports the intent of Policy LR P3, particularly the use of best science, it seems that this policy promotes the opposite of ‘adaptive management’ as the nitrogen loads have been ‘locked in’; the ROTAN model was used in 2011 to estimate the start position for nitrogen loss reductions, and OVERSEER version 6.2.0 was superseded by version 6.2.1 in December 2015. It is considered inappropriate to lock in the use of a previous version of OVERSEER that is not currently available for use. As submitted above there should be mechanisms to amend figures/data without requiring a plan change.</p> <p>Ravensdown submits that flexibility is required to update the science and management approach.</p>
6	5	Policy LR P4	Oppose in part/Support in part	<p>Ravensdown seeks for Council to:</p> <ul style="list-style-type: none"> <li>Retain the intent of Policy LR P4 and in particular the adaptive management</li> </ul>	Ravensdown supports the adaptive management approach included in the policy, and the regular reviews proposed. However, as discussed in Part I above, it considers the management plan proposed in Clause (iii) should be called a



				<p>approach;</p> <ul style="list-style-type: none"> <li>• Re-name the management plan to a Nutrient Management Plan;</li> <li>• Move the use of reference files to outside the plan provisions (as per ECan Plan Change 3);</li> <li>• Include the requirement for property/farming enterprises to manage nutrient losses through GMP.</li> </ul>	<p>Nutrient Management Plan to properly reflect its purpose. Ravensdown also considers the OVERSEER reference files should sit outside of the plan provisions. Ravensdown also considers this policy should require the use of good management practices (GMP) to manage nutrient losses.</p>
7	6	Policy LR P5	Support in part/oppose in part	<p>Ravensdown seeks for Council to:</p> <ul style="list-style-type: none"> <li>• Retain the overall intent of Policy LR P5;</li> <li>• Reference Schedule LR One to determine a NDA, and Schedule LR Seven relating to the transfer of a NDA;</li> <li>• Carry the intent of the policy (not to require a property/farming enterprise to reduce its nitrogen loss below the bottom of the relevant sector loss range) into the rules;</li> <li>• Implement the policy on a property basis;</li> <li>• Delete reference to a particular version of OVERSEER used;</li> <li>• Provide for a mechanism for updating when OVERSEER changes without having to undertake a plan change (as per ECan Plan Change 3);</li> <li>• Remove Table LR 4 from Policy LR P5.</li> </ul>	<p>Ravensdown supports the intent of the policy to allocate nitrogen discharge allowances to achieve the sustainable load to Lake Rotorua. However, as discussed in Part I above, Ravensdown is concerned there is no reference to Schedules LR One or Seven in the policy and one particular version of OVERSEER is locked in. In addition, Ravensdown is not clear where the intent of the policy (i.e. not requiring a property/farming enterprise to reduce its nitrogen loss below the bottom of the relevant sector loss range) is taken through into the rules. It seems the intention is to implement the policy by block and not by property. As a nutrient budget provider Ravensdown considers this to be difficult to implement.</p> <p>Table LR 4 should sit outside the plan to avoid locking in a version of OVERSEER and the nitrogen losses determined by the older version.</p>

8	6	Policy LR P6	Oppose	<p>Ravensdown seeks for Council to:</p> <ul style="list-style-type: none"> <li>• Delete Policy LR P6; or if retained</li> <li>• Clarify its intent.</li> </ul>	<p>Ravensdown is unclear what the policy is addressing and what the implications are of its implementation. It seems to only require a NDA to be determined for activities that are controlled or non-complying, which seems contrary to Policy LR P5. Ravensdown considers the policy should be deleted, or if retained, clarified so that its.</p>
9	6	Policy LR P7	Oppose in part/support in part	<p>Ravensdown seeks for Council to:</p> <ul style="list-style-type: none"> <li>• Delete Policy LR P7; or if retained</li> <li>• Clarify its intent and its relationship with the rules; re-write it to be enabling and consistent with Policy LR P5; and reference Schedule LR Seven.</li> </ul>	<p>While Ravensdown supports the intent of encouraging efficient outcomes in the Lake Rotorua catchment, it considers the policy is confusing and is not consistent with Policy LR P5. It is not clear what the issue the policy is trying to address, and what the term ‘authorised’ means. It is also not clear how this this policy is carried through into the rules. There is also no reference to Schedule LR Seven which intends to set the methodology for transfers.</p>
10	6	Policy LR P8	Support in part/oppose in part	<p>Ravensdown seeks for Council to:</p> <ul style="list-style-type: none"> <li>• Retain the intent of Policy LR P8;</li> <li>• Re-name the management plan to a Nutrient Management Plan;</li> <li>• Include the requirement for property/farming enterprises to manage nutrient losses through GMP;</li> <li>• Delete “(five-yearly nitrogen loss reduction targets)”.</li> </ul>	<p>Ravensdown supports the intent of the policy. However, as discussed in Part I above, it considers the management plan should be called a Nutrient Management Plan to properly reflect its purpose. Ravensdown also considers this policy should require the use of good management practices (GMP) to manage nutrient losses.</p> <p>The plan already defines Managed Reduction Targets and so it is not necessary to include the definition in the policy.</p>
11	6	Policy LR P9	Oppose	<p>Ravensdown seeks for Policy LR P9 to be deleted.</p>	<p>Ravensdown considers the policy has no purpose as it simply mirrors the rules.</p>
12	7	Policy LR P10	Oppose	<p>Ravensdown seeks for Policy LR P10 to be deleted.</p>	<p>Similar to Policy LR P9 above, Ravensdown considers the policy has no purpose as it simply mirrors the rules.</p>

13	7	Policy LR P11	Oppose	Ravensdown seeks for Policy LR P11 to be deleted.	Similar to the above policies, Ravensdown considers the policy has no purpose as it simply mirrors the rules.
14	7	Policy LR P12	Oppose	Ravensdown seeks for Policy LR P12 to be deleted.	Similar to the above policies, Ravensdown considers the policy has no purpose as it simply mirrors the rules.
15	7	Policy LR P13	Oppose	Ravensdown seeks for Policy LR P13 to be deleted and for the plan to include for a mechanism for updating when OVERSEER changes without having to undertake a plan change (as per ECan Plan Change 3).	Similar to the above policies, Ravensdown considers the policy has no purpose and locks in a version of OVERSEER that has already been updated and will therefore not be available for use. Ravensdown considers a definition of OVERSEER could be included in the plan, and include in the plan a mechanism for updating OVERSEER when there are changes without having to undertake a plan change (as per ECan Plan Change 3).
16	7	Policy LR P14	Oppose	Ravensdown seeks for Policy LR P14 to be deleted.	Similar to the above policies, Ravensdown considers the policy has no purpose. The statement that specific land uses cannot be readily modelled in OVERSEER is misleading and subjective, and it is unsure who has the final say as to whether OVERSEER cannot be readily used.
17	7	Policy LR P15	Oppose	Ravensdown seeks for Policy LR P15 to be deleted and the information requirements be listed in the administrative section of the district plan.	Similar to the above policies, Ravensdown considers the policy has no purpose and the information requirements to be supplied as part of a consent application is usually included in the administration section of a district plan.
18	8	Policy LR 16	Oppose in part/support in part	Ravensdown seeks for Council to: <ul style="list-style-type: none"> <li>• Retain the twenty-year duration for controlled activity consents;</li> <li>• Amend the policy to provide for a minimum duration of fifteen years for a Discretionary Activity consent.</li> </ul>	Ravensdown considers farming activities need certainty, and therefore supports the intent to provide for a twenty-year consent duration for controlled activities. However, activities that currently do not meet the controlled activity conditions default to non-complying under the proposed plan (although Ravensdown's submission below seeks that this as a Discretionary Activity). Ravensdown do not support the intent of the policy to grant this activity for durations less than 20 years, or at least not providing any certainty as to the consent duration. For example, a consent duration of two years would be considered to be inappropriate. The policy must provide more direction.

19	8	Policy LR P17	Oppose	Ravensdown seeks for Policy LR P17 to be deleted.	Ravensdown opposes the policy as it pre-empts a proper assessment of a resource consent and an assessment of the environmental effects as provided for in the Resource Management Act.
20	-	New Policy - Benchmarking	-	Ravensdown seeks for Council to: <ul style="list-style-type: none"> <li>• Add a new policy that clearly identifies how benchmarking will be undertaken;</li> <li>• Take a revised approach to benchmarking for the next 5 years and benchmark property/farming enterprises on the actual nutrient losses over that period.</li> </ul>	As discussed in Part I above, Ravensdown considers Proposed PC 10 lacks any policy direction regarding benchmarking, and the methodology outlined in Schedule LR One is confusing. Ravensdown's preference is for Council to take a revised approach to benchmarking for the next 5 as opposed to reliance on an historical benchmark, now over ten years old, with questionable relevance to nitrogen losses under the current version of OVERSEER. This would allow for actual nutrient losses to be measured from a farm system meaning the benchmark can be determined from actual results and the percentage reduction required can be based on real not predicted values.
21	9	Method LR M5	Oppose in part/support in part	Ravensdown seeks for Council to: <ul style="list-style-type: none"> <li>• Retain the intent to prepare a Rule Implementation Plan and include a date for completing the plan and a review period;</li> <li>• In (a), add a footnote to say that the implementation plan will be development in collaboration with the primary sector representatives (and others, for example, iwi etc.).</li> <li>• Develop a set of protocols for the development and maintenance of a NDA register to ensure its purpose is clear and access is limited to retain privacy;</li> </ul>	While Ravensdown supports the development of Rule Implementation Plan, it considers timeframes are required for when that plan will be prepared, and when it will be reviewed. Ravensdown also considers it important that the primary industry is involved in the development of any implementation plan. This collaborative approach to implementation has worked with other regional councils. In relation to the development and maintenance of a NDA register, Ravensdown is concerned there may be privacy issues regarding holding such a register, and protocols may be required to determine confirm the purpose of the register and who can access it. Ravensdown considers a benchmark register would also be a useful tool for Council, subject to similar protocols being developed.  In relation to (d), land use change is not necessarily required to reduce nitrogen and phosphorus losses in the catchment, and Ravensdown considers that council services and incentives should be focused on supporting and directing farming. properties to implement good management practices

				<ul style="list-style-type: none"> <li>Consider developing a Benchmark Register with similar protocols.</li> <li>In (d), delete 'change and land use change' and add 'practices'.</li> </ul>	In relation to (e), while Ravensdown supports the intent, it considers this matter should be a policy. Ravensdown has requested Policy LR P2 be amended to include good management practices and therefore (e) can be deleted.
22	10	Introduction to Rules – first sentence	Oppose	Ravensdown seeks for Council to amend the first sentence to read: <i>“Rules LR R1 to LR R13 apply to the management of land use activities on properties/farming enterprises in the Lake Rotorua groundwater catchment for the purpose of managing nitrogen loss <del>onto or</del> from land where it could enter Lake Rotorua.”</i>	Ravensdown opposes the intention of the rule to control the input of nitrogen onto land. The first sentence is not correct by referring to inputs as a 'nitrogen loss'. Nitrogen inputs can be managed through implementing good management practices for nutrient management, including compliance with the Code of Practice for fertiliser use. The rules should not intend to control these inputs.
23	10	Introduction to Rules - Definition: Property/farming enterprise	Oppose	Ravensdown seeks for Council to delete the definition of property/farming enterprise from the introduction as it already included in the Definitions (page 20).	Ravensdown considers it is not appropriate for the definition of property/farming enterprise to be included at the beginning of the rules. Ravensdown notes that property/farming enterprise is included in the definitions on page 20 of Proposed PC 10.
24	10	General Advice Notes for rules: No. 4	Oppose in part	Ravensdown considers there needs to be a clear statement that identifies which provisions takes precedence where the provisions of the operative Regional Plan Water & Land Plan and Part II LR and Part III LR of the proposed PC 10 address the same activity.	Ravensdown considers there is a need to clearly identify how a conflict will be managed for activities that are addressed by both operative Regional Plan Water & Land Plan and Part II LR and Part III LR of the proposed PC 10. Which rule will take precedence?
25	10	General Advice Notes for rules: No. 5	Oppose	Ravensdown seeks for Council to delete the General Advice Notes for rules: No. 5.	Ravensdown considers the advice note serves no purpose and is not necessary.
26	11	Rule summary flowchart	Oppose	Ravensdown seeks for Council to delete the rule summary chart.	Ravensdown considers the flowchart is unhelpful and serves no purpose. It has been condensed and is incomplete.
27	12	Rule LR R1	Oppose in part/support in part	Ravensdown seeks for Council to: <ul style="list-style-type: none"> <li>Amend condition (a) to read: <i>“there is no increase in effective area, <del>nitrogen inputs</del></i></li> </ul>	As discussed in Part I above, Ravensdown opposes the input controls included in the rule. Input control does not necessarily relate to the volume of nitrogen loss and is not 'effects' based. Addressing the farm system losses is effects based and provides

				<p><i>or stocking rates or increase in nitrogen loss from the date of notification that may contribute to an increase in nitrogen loss onto, into or from land.”;</i></p> <ul style="list-style-type: none"> <li>Amend the plan to provide for an activity that does not comply with condition (a) as a restricted discretionary activity, with Council restricting its discretion to that matter that cannot be complied with.</li> </ul>	<p>for and encourages innovation and flexibility in farming operations, to provide greater efficiencies.</p> <p>The Section 32 Evaluation (section 11.7.1) recognises the problems with input control and concludes ‘<i>this option will not be effective in achieving the environmental target with certainty, and would not incentivise efficient resource use</i>’.</p> <p>Ravensdown considers it is also unclear what the default rule is if a property/farming enterprise cannot comply with condition (a) of this rule. It seems to be Rule LR R12, which would make such an activity non-complying. Ravensdown opposes this outcome.</p> <p>Ravensdown supports the permitted activity status of the rule.</p>
28	12	Rule LR R2	Support in part/oppose in part	<p>Ravensdown seeks for Council to retain the intent of the rule and to:</p> <ul style="list-style-type: none"> <li>Delete condition (c);</li> <li>Provide for the transfer of nitrogen loss entitlement should be provided for as a discretionary activity until 2022.</li> </ul>	<p>While Ravensdown supports the intent of the rule, it considers that condition (c) should be deleted and the transfer of nitrogen loss entitlement should be provided for as a discretionary activity until 2022.</p>
29	12	Rule LR R3	Support in part/oppose in part	<p>Ravensdown seeks for Council to retain the intent of the rule and to:</p> <ul style="list-style-type: none"> <li>Delete condition (b);</li> <li>Provide for the transfer of nitrogen loss entitlement should be provided for as a discretionary activity until 2022.</li> </ul>	<p>While Ravensdown supports the intent of the rule, it considers that condition (b) should be deleted and the transfer of nitrogen loss entitlement should be provided for as a discretionary activity until 2022.</p>
30	12-13	Rule LR R4	Support in part/oppose in part	<p>Ravensdown seeks for Council to retain the intent of the rule and to:</p> <ul style="list-style-type: none"> <li>Delete the first bullet point in the rule;</li> <li>Amend condition (c) to read “<i>there is no</i></li> </ul>	<p>While Ravensdown supports the intent of the rule, it considers the two bullet points say essentially the same thing and the first bullet point can be deleted. As discussed in Part I above, Ravensdown opposes an input control approach and seeks for condition (c) to be amended to delete the reference. As per</p>

				<p><i>increase in effective area, <del>nitrogen inputs or stocking rates</del> or increase in nitrogen loss from <u>the date of notification</u> <del>that may contribute to an increase in nitrogen loss onto, into or from land.</del>”;</i></p> <ul style="list-style-type: none"> <li>• Delete condition (d);</li> <li>• Provide for the transfer of nitrogen loss entitlement should be provided for as a discretionary activity until 2022.</li> </ul>	<p>above, condition (d) should be deleted and the transfer of nitrogen loss entitlement should be provided for as a discretionary activity until 2022.</p>
31	13	Rule LR R5	Support in part/oppose in part	<p>Ravensdown seeks for Council to retain the intent of the rule and to:</p> <ul style="list-style-type: none"> <li>• Amend condition (a) to read “<i>there is no increase in effective area, <del>nitrogen inputs or stocking rates</del> or increase in nitrogen loss from <u>the date of notification</u> <del>that may contribute to an increase in nitrogen loss onto, into or from land.</del>”;</i></li> <li>• Delete condition (c);</li> <li>• Provide for the transfer of nitrogen loss entitlement should be provided for as a discretionary activity until 2022.</li> </ul>	<p>While Ravensdown supports the intent of the rule, as discussed in Part I above, Ravensdown opposes an input control approach and seeks for condition (a) to be amended to delete the reference. As per above, condition (c) should be deleted and the transfer of nitrogen loss entitlement should be provided for as a discretionary activity until 2022.</p>
32	14	Rule LR R6	Oppose in part	<p>Ravensdown seeks for Council to delete Rule LR R6. If Council decides to retain the rule, amend it as follows:</p> <ul style="list-style-type: none"> <li>• Amend condition (b) to read “<i>there is no increase in effective area, <del>nitrogen inputs or stocking rates</del> or nitrogen loss from <u>the</u></i></li> </ul>	<p>Ravensdown considers it is not clear why a particular rule is required for those properties that were ‘<i>not previously managed</i>’ by Rules 11 to 11F. This brings in a new level of complexity that does not seem warranted. Also, the rule could include properties within the Lake Rotorua catchment that were not ‘actively’ managed in accordance with these old rules. If Council retains the</p>

				<p><i>date of notification that may contribute to an increase in nitrogen loss onto, into or from land.</i> ”;</p> <ul style="list-style-type: none"> <li>• Delete condition (d);</li> <li>• Provide for the transfer of nitrogen loss entitlement should be provided for as a discretionary activity until 2022;</li> <li>• Amend the title (in bold) to provide for farming activities that are not otherwise permitted by rules R2, R3, R4, or R5.</li> </ul>	<p>rule, as discussed in Part I above, Ravensdown opposes an input control approach and seeks for condition (b) to be amended to delete the reference. As per above, condition (d) should be deleted and the transfer of nitrogen loss entitlement should be provided for as a discretionary activity until 2022.</p> <p>The second bullet point states that this rule also provides for farming activities that were not otherwise permitted by Rules R2 to R5, however the title of the rule does not specify that. This may lead to confusion by a resource user trying to determine where their activity sits in the plan.</p>
33	14-15	Rule LR R7	Oppose in part/support in part	<p>Ravensdown seeks for Council to:</p> <ul style="list-style-type: none"> <li>• Amend condition (a) to read; “<i>prepared by a suitable qualified and experienced person, demonstrating that the property/farming enterprise’s nitrogen loss is less than 68% of the nitrogen loss rate generated by the drystock reference file prescribed in Schedule LR Five.</i>”</li> <li>• Amend condition (a) to include the requirement to provide annual information in accordance with Schedule LR Three for monitoring purposes and a Nutrient Budget to be submitted every three years;</li> <li>• Delete Condition (a) (2);</li> <li>• Delete condition (b);</li> <li>• Provide for the transfer of nitrogen loss</li> </ul>	<p>Ravensdown considers there is a need to provide a definition of “<i>low intensity farming activities</i>” in the definitions section, as opposed to having the definition within the body of the rules. Ravensdown considers the words in (a) “<i>demonstrating that the...in Schedule LR Five</i>” are not needed as they repeat the requirement that is already stated in the rule above. Ravensdown supports the requirement of condition (a)(1) to submit annual information, but the focus should just be for monitoring purposes and not that the inputs are controlled to see if they stay the same. In condition (a) an Overseer nutrient budget should only be submitted every three years to ensure that the nitrogen losses are less than 68% of the reference file, therefore the focus on the inputs is not warranted or required.</p> <p>Ravensdown considers condition (a)(2) makes no sense, as it asks for the provision of a nutrient budget which demonstrates that the farms nitrogen loss is less than the nitrogen loss of the reference file, and not that the farms nitrogen losses are less than 68% of</p>



				entitlement should be provided for as a discretionary activity until 2022.	the reference file. Under the definition if a farm is above 68% of the reference drystock file then that activity is not a low intensity and would be considered under another rule. As per above, condition (b) should be deleted and the transfer of nitrogen loss entitlement should be provided for as a discretionary activity until 2022.
34	15-16	Rule LR R8	Support in part/oppose in part	<p>Ravensdown seeks to retain the controlled activity status of the rule, and the intention to consider any consent application on a non-notified basis.</p> <p>Ravensdown also seeks Council to amend Rule LR R8 as follows:</p> <ul style="list-style-type: none"> <li>• Amend the title of the rule to read (or similar): <i>“The use of land for farming activities <u>either</u> on properties/farming enterprises less than 40 hectares in effective area, or that were not previously managed by Rule 11 to 11F, <del>that where</del> <u>neither do not meet permitted activity conditions</u>”</i>;</li> <li>• Refer to a Nutrient Management Plan in condition (b) and matters of control (v) and (vi);</li> <li>• Delete matters of control (ii), or if retained, be limited to the requirement of a nutrient budget which shows that the agreed targets are being met;</li> <li>• Delete matters of control (iii);</li> <li>• As part of requiring a Nutrient</li> </ul>	<p>Ravensdown supports the controlled activity status of the rule, and the intent of the rule to adopt a non-notified approach. Notwithstanding this support, Ravensdown considers the following matters should be addressed:</p> <ul style="list-style-type: none"> <li>• The title of Rule LR R8 is confusing and needs to be amended to apply to either less than 40 hectares or areas not previously managed by Rule 11 – 11F where either do not meet the permitted activity conditions.</li> <li>• Condition (b) and matters of control (v) and (vi) should be amended refer to a Nutrient Management Plan, as discussed in Part I above.</li> <li>• Matters of control (ii) should be deleted, or if retained be limited to the requirement of a nutrient budget which shows that the agreed targets are being met.</li> <li>• Matters of control (iii) does not seem to be necessary and should be deleted.</li> <li>• As part of requiring a Nutrient Management Plan, Council should require a Nutrient Budget be prepared that is valid for 3 years, unless there is a significant farm change.</li> </ul>

				Management Plan, Council should require a Nutrient Budget be prepared that is valid for 3 years, unless there is a significant farm change.	
35	16	Rule LR R9	Support in part/oppose in part	<p>Ravensdown seeks to retain the controlled activity status of the rule, and the intention to consider any consent application on a non-notified basis. Ravensdown also seeks Council to amend Rule LR R9 as follows:</p> <ul style="list-style-type: none"> <li>• Refer to a Nutrient Management Plan in condition (b) and matters of control (v) and (vi);</li> <li>• Delete matters of control (ii), or if retained, be limited to the requirement of a nutrient budget which shows that the agreed targets are being met;</li> <li>• Delete matters of control (iii);</li> <li>• As part of requiring a Nutrient Management Plan, Council should require a Nutrient Budget be prepared that is valid for 3 years, unless there is a significant farm change.</li> </ul>	<p>Ravensdown supports the controlled activity status of the rule, and the intent of the rule to adopt a non-notified approach. Notwithstanding this support, Ravensdown considers the following matters should be addressed:</p> <ul style="list-style-type: none"> <li>• Condition (b) and matters of control (v) and (vi) should be amended refer to a Nutrient Management Plan, as discussed in Part I above.</li> <li>• Matters of control (ii) should be deleted, or if retained be limited to the requirement of a nutrient budget which shows that the agreed targets are being met.</li> <li>• Matters of control (iii) does not seem to be necessary and should be deleted.</li> <li>• As part of requiring a Nutrient Management Plan, Council should require a Nutrient Budget be prepared that is valid for 3 years, unless there is a significant farm change.</li> </ul>
36	17	Rule LR R10	Support in part/oppose in part	<p>Ravensdown seeks to retain the controlled activity status of the rule, and the intention to allow for the transfer of nitrogen loss entitlement and consider any consent application on a non-notified basis. Ravensdown also seeks Council to amend Rule LR</p>	<p>Ravensdown supports the controlled activity status of the rule, the intent of the rule to allow for the transfer of nitrogen loss entitlements, and the intent of the rule to adopt a non-notified approach. Notwithstanding this support, Ravensdown considers the</p>

				<p>R10 as follows:</p> <ul style="list-style-type: none"> <li>• Refer to a Nutrient Management Plan in condition (c) and matters of control (v) and (vi);</li> <li>• Delete matters of control (ii), or if retained, be limited to the requirement of a nutrient budget which shows that the agreed targets are being met;</li> <li>• Delete matters of control (iii);</li> <li>• As part of requiring a Nutrient Management Plan, Council should require a Nutrient Budget be prepared that is valid for 3 years, unless there is a significant farm change.</li> </ul>	<p>following matters should be addressed:</p> <ul style="list-style-type: none"> <li>• Condition (c) and matters of control (v) and (vi) should be amended refer to a Nutrient Management Plan, as discussed in Part I above.</li> <li>• Matters of control (ii) should be deleted, or if retained be limited to the requirement of a nutrient budget which shows that the agreed targets are being met.</li> <li>• Matters of control (iii) does not seem to be necessary and should be deleted.</li> <li>• As part of requiring a Nutrient Management Plan, Council should require a Nutrient Budget be prepared that is valid for 3 years, unless there is a significant farm change.</li> </ul>
37	18	Rule LR R11	Oppose	Ravensdown seeks for the Council to delete Rule LR R11.	Ravensdown considers this rule is it not required and can be deleted. Schedule LR Six has provision for an alternative model for farms that cannot be modelled with OVERSEER. The farming activity can be assessed under another relevant rule, as long as there is a provision in that rule for a Nutrient Management Plan to be undertaken (Rules LR R8-10).
38	19	Rule LR R12	Oppose	Ravensdown seeks for Council to amend Rule LR R12 to be a Discretionary Activity.	Ravensdown does not consider it is necessary or appropriate for an activity unable to meet the permitted or controlled activity conditions should default to a non-complying activity and submits that the status be amended to Discretionary. Discretionary activity status still allows for Council to decline consent, but does not require a resource user who may have minor adverse effects to go through the additional two gate-way test required when applying for a non-complying activity. Ravensdown considers the plan requires some flexibility which a non-complying activity does not allow.

39	20	New Definition: Low Intensity Farming	-	Ravensdown seeks for Council to add a new definition of <i>'low intensity farming'</i> .	Ravensdown considers there is a need to provide a definition of <i>'low intensity farming activities'</i> as this term is used in the rules (including Rule LR R7). Words that reflect Rule LR R7 would be appropriate.
40	20	Definition: Nitrogen Budget	-	Ravensdown seeks for the definition of a Nitrogen Budget to be amended by adding the following to the definition: " <i>... outputs. <u>Nitrogen Budgets must be prepared using the OVERSEER Nutrient Budget model (or an alternative model authorised by the Regional council) and must be prepared by a suitably qualified person certified under the Certified Nutrient Management Advisor Programme.</u></i> "	Ravensdown considers the definitions should specify that a Nitrogen Budget is typically produced by an OVERSEER Nutrient Budget or an alternative approved by the Regional Council, as specified in Schedule LR Six. A suitably qualified person needs to provide an OVERSEER Nutrient Budget for regulatory purposes and must be a Certified Nutrient Management Advisor certified under the Certified Nutrient Management Advisor Programme.  Ravensdown considers the proposed definition is vague and could be met, for example, by a rudimentary estimate of crop nutrient removal and fertiliser inputs alone, assessed by many different means.
41	21	Definition: Nitrogen Management Plan	-	Ravensdown seeks for Council to delete the reference to a <i>'Nitrogen Management Plan'</i> and replace it with the term <i>'Nutrient Management Plan'</i> .	As discussed above, Ravensdown seeks for Council to delete the term <i>'Nitrogen Management Plan'</i> and replace it with <i>'Nutrient Management Plan'</i> . The current definition of Nitrogen Management Plan can be retained for the term <i>'Nutrient Management Plan'</i> .
42	21	Definition: Property/farming enterprise	Support in part	Ravensdown seeks for Council to amend the definition to read: <i>"A single operating unit regardless of its ownership structure, size, arrangement and number of parcels and legal tenure <u>that is managed for the purposes of nutrient management.</u>"</i>	Ravensdown considers the definition of property/farming enterprise to include that they are managed for the purposes of nutrient management.
43	21	Definition: Nitrogen Discharge Allowance	Oppose	Ravensdown seeks for Council to delete the definition and replace it with the definition in Schedule LR One: <i>"<u>A property/farming enterprise's Nitrogen</u></i>	Ravensdown considers there needs to be consistency in the use of terms and definitions for clarity.  The current Nitrogen Discharge Allowance definition could be interpreted as saying two different things:

				<i>Discharge Allowance equals the sum of the allowable nitrogen losses, post 2032, for all of the blocks within the property/farming enterprise (drystock, dairy, bush/scrub, plantation forestry and house block)."</i>	<ul style="list-style-type: none"> <li>- Nitrogen Discharge Allowance is a maximum annual nitrogen loss per farm; or</li> <li>- That the Nitrogen Discharge Allowance is a maximum nitrogen loss per block.</li> </ul>
44	21	Definition: Overseer file	Oppose	Ravensdown seeks for Council to replace the definition with the following: <i>"An Overseer File represents the record of farm system data which is used to execute the OVERSEER Nutrient Budgets model for a single analysis of the farm and its management system."</i>	Ravensdown considers the current definition is the same as the Nitrogen Budget and does not accurately represent what an Overseer File is.
45	21	Definition: Reference files	Oppose in part/support in place	Ravensdown seeks Council to replace the definition with the following: <i>"Reference files are Overseer files that have been created for hypothetical dairy and drystock properties that:</i> <ul style="list-style-type: none"> <li>• <i>Have geophysical characteristics that are representative of the catchment (soil, slope and rainfall) which are used to represent the permitted activity nitrogen loss for the sector for the average property at 2032."</i></li> </ul>	Ravensdown supports consistency of terminology used where possible. The suggested definition is adapted from Step 1 in Schedule LR Five – Use of OVERSEER and Reference Files.
46	21	Definitions: Suitably qualified and experienced person	Oppose in part	Ravensdown seeks for Council to replace the first bullet point with the following: <ul style="list-style-type: none"> <li>• <i>"Is a Certified Nutrient Management Adviser, certified under the Nutrient Management Adviser Certification</i></li> </ul>	Ravensdown considers that the first bullet point should be deleted as procedures should be specified in the rules and methods (procedural protocols do not make a person qualified and suitably experienced). Ravensdown also considers the reference to intermediate and advanced sustainable Nutrient Management Course should be deleted. Even though they are a necessary prerequisite, they are

				<p><i>Programme and...”;</i></p> <ul style="list-style-type: none"> <li>Delete reference to intermediate and advanced Sustainable Nutrient Management Course in bullet point two.</li> </ul>	a component of Certification under the CNMA programme.
47	21	New Definition: Start Points	-	Ravensdown seeks for Council to provide a definition that defines how the 2032 Nitrogen Discharge Allowance start point is determined.	<p>As discussed Part 1 above, Ravensdown considers there is confusion over a property’s Rule 11 status from the previous Land and Water Regional Plan. Schedule LR One does not adequately or accurately define how the 2032 Nitrogen Discharge Allowance start point is determined. The implication is that a property uses the actual benchmark from 2004 having used an old version of Overseer which is likely not relevant. There may be issues over blocks sold and bought which would have implications on the benchmark figure.</p> <p>In its submission below on Schedule LR One Ravensdown seeks the old Rule 11 benchmark approach to be deleted. However, if Council decides to retain this approach, the start points needs to be better defined.</p>
48	22	Schedule LR One	Oppose in part	<p>Ravensdown seeks for Council to either:</p> <ol style="list-style-type: none"> <li>Delete the old Rule 11 benchmark and revise its approach to benchmarking developed in Schedule LR One by: <ul style="list-style-type: none"> <li>Measuring the actual nutrient losses from a farm system for the next 5 years;</li> <li>Determining a benchmark and the percentage reduction required from actual results; or</li> </ul> </li> <li>If Council retains the current approach, to</li> </ol>	<p>As discussed in Part I above, Ravensdown considers the benchmarking approach is confusing and unhelpful. In particular, it is not clear how a benchmark under the previous Rule 11 was developed; what time period or modelling was used (presumably an older OVERSEER version); and therefore the relevance as a starting point questionable and may be meaningless.</p> <p>Ravensdown considers Council should take a revised approach to benchmarking for the next 5 years as opposed to an historical benchmark based on questionable modelling.</p>

				<p>better define the start point determination, using the old benchmarking process/results.</p> <p>A suggested definition would be: <i>“The nitrogen loss benchmark for a block and for a property as a sum of all block nitrogen loss benchmarks developed in accordance with Schedule LR One.”</i></p>	
49	25	Schedule LR Two	Support in part	<p>Ravensdown seeks for Council to amend Schedule LR Two to:</p> <ul style="list-style-type: none"> <li>• Provide the nitrogen loss value which provides for permitted activity land use under Rule LR R4;</li> <li>• Make it clear the Stocking Rate limits are default representations of the nitrogen loss value for permitted activity on farms/ farming enterprises between 5 and 10 hectares in effective area;</li> <li>• Make it clear they are introduced for efficiencies in administration and capability to manage small properties, where detailed modelling of farm system losses is not warranted;</li> </ul> <p>Ravensdown also seeks for Council to amend the title of Schedule LR Two to make it clear the stocking rates are a Default nitrogen loss representation.</p>	<p>While Ravensdown is opposed to input limits based on stocking rate (for reasons discussed in Part 1 above), it recognises the benefits of using a simple look-up table as a surrogate for nitrogen loss outputs for application of permitted activity for low intensity properties less than 10 Ha. Ravensdown considers this is a pragmatic solution to free up resources and technical capability to address more intensive farm system output assessments. Ravensdown considers the stocking rate should be a default option for the specified nitrogen loss value for low intensity land use activity.</p>

50	27	Schedule LR Three	Support in part	Ravensdown seeks for Council to retain a clear format for information requirements to be collected to manage nutrient losses effectively. It should also be clear that the use of farm data to place limits on farm system inputs is not intended.	While Ravensdown opposes the use of the information and records proposed in Schedule 3 to impose input limits, it is recognised that good information is needed to provide for an effective output based Nutrient Management Plan and for the generation of OVERSEER files.
51	29	Schedule LR Five	Oppose in part	Ravensdown seeks for Council to: <ul style="list-style-type: none"> <li>Remove reference to a specific OVERSEER version;</li> <li>Delete the requirement for “annual” OVERSEER nutrient budget files to be submitted as part of a consent or permitted activity conditions. Nutrient Budgets should be valid for three years at least, unless there is a significant farm system change.</li> </ul>	As Discussed in Part 1 above, Ravensdown opposes the reference to one particular version of OVERSEER, and in particular version 6.2.0 has already been superseded but is specifically referenced in the Plan Change. Ravensdown considers OVERSEER calculations should sit outside the Plan, within a reference document.  Ravensdown also opposes the use of annual nutrient budgets from OVERSEER. As a long term annual average model, nutrient budgets should last for three years at least, unless there is a significant farm system change.
52	32	Schedule LR Six	Oppose in part/support in part	Ravensdown seeks for Council to adopt the term ‘ <i>Nutrient Management Plan</i> ’ rather than ‘ <i>Nitrogen Management Plan</i> ’.  Ravensdown also seeks for Council to define the term ‘ <i>significant farm change</i> ’ to provide certainty to the resource user – it is suggested that the terms ‘ <i>significant farm change</i> ’ from section 7(ii) and ‘ <i>substantial change</i> ’ from Table LR 5 in Schedule LR One be combined into one definition and explained qualitatively and/or quantitatively.	As discussed above, Ravensdown prefers the term ‘ <i>Nutrient Management Plan</i> ’ which better reflects the intent of the mechanism, and the wider management of nutrients (including phosphorus) as included in Schedule LR Six.  Ravensdown also considers clarity is required regarding what constitutes a ‘ <i>significant farm system change</i> ’. It is suggested that the terms ‘ <i>significant farm change</i> ’ from section 7(ii) and ‘ <i>substantial change</i> ’ from Table LR 5 in Schedule LR One be combined into one definition and explained qualitatively and/or quantitatively.
53	34	Schedule LR Seven	Oppose in part	Ravensdown considers the phrase ‘ <i>Evidence will be required of the legal basis of managed Nitrogen Discharge Allowance</i> ’ requires an explanation to assist the plan users to understand what is expected.	Ravensdown considers the phrase ‘ <i>Evidence will be required of the legal basis of managed Nitrogen Discharge Allowance transfer</i> ’ needs an explanation. It is not clear what this means and how such information is to be provided.



				<p>If the offsets are appropriate for the Managed Reduction Targets, provision for permanent offset should be made to support a meeting the Nitrogen Discharge Allowance.</p>	<p>Under <i>'Transfer of Managed Reduction Offsets'</i> the transfer of Managed Reduction Offsets can be used to meet a Managed Reduction Target, but are limited to 5 years and therefore cannot be used to meet the Nitrogen Discharge Allowance.</p> <p>If the offsets are appropriate for the Managed Reduction Targets, provision for permanent offset should be made to support a meeting the Nitrogen Discharge Allowance.</p>
54	-	OVERSEER use	-	<p>Ravensdown seeks for Council to ensure all references to the undertaking of an OVERSEER nutrient budget clarifies that the nutrient budget must be prepared in accordance with the current version of the OVERSEER Best Practice Data Input Standards.</p>	<p>Ravensdown considers there needs to be clarity provided in the plan that ensures a nutrient budget must be prepared in accordance with the current version of the OVERSEER Best Practice Data Input Standards.</p>