Section: Methods

Panel Recommendation

Refer to the body of our report for our recommendation on this section.

Submissions					
Submission Number:	53: 44	Submission Type: Support			
Submitter:	Lachlan McKenzie				
Submission Summary:	Give effect to recommended altern	nate framework, consistent with TWLP Method 41.			
Decision Sought:	Add new method as outlined in the	e hardcopy submission or to similar effect.			
Panel Recommendations:	Reject				
Submission Number:	53: 91	Submission Type: Oppose in Part			
Submitter:	Lachlan McKenzie				
Submission Summary:	I request reasons as to why this m	ethod is not open for submission.			
Decision Sought:	 Any landowners or territorial auth 	ikato Regional Council and South Waikato District Council to ensur norities in that part of the Rotorua Lake Catchment within the Waikat te in the development of the relevant sub-catchment action plan.			
Panel Recommendations:	Reject				
Submission Number:	66: 82	Submission Type: Support in Part			
Submitter:	Lake Rotorua Primary Producers	Lake Rotorua Primary Producers Collective			
Submission Summary:	Give effect to recommended alternative framework, consistent with TWLP Method 41.				
Decision Sought:	Add new method requiring the development and implementation of sub-catchment action plans, and setting out the process for developing the action plans (refer to submission for detailed wording). or to similar effect.				
Panel Recommendations:	Reject				
Further Submission(s)					
Further Submiss	ion No: 6 - 36	Submission Type: Support			
Further Submitte	er: CNI Iwi Land Mana	CNI Iwi Land Management Ltd			
Submission Sum	nmary: For the reasons giv	en in the original submission.			
Decision Sought	t: As above				
Panel Recommendations	s: Reject				
Submission Number:	66: 83	Submission Type: Oppose in Part			
Submitter:	Lake Rotorua Primary Producers	Collective			
Submission Summary:	RPS method page 9: Cross bound for submission when it has signification	lary issues: We request reasons as to why this method is not open ant impact on members.			
Decision Sought:	Amend Regional Policy Statement Method 10 to read: Liaise with Waikato Regional Council and xx District Council to ensure: Any landowners or territorial authorities in that part of the Rotorua Lake Catchment within the Waikato region are encouraged to participate in the development of the relevant sub-catchment Action Plan.				

Submission Number:	75: 159	Submission Type:	Oppose in Part
Submitter:	Federated Farmers of New Zealand		
Submission Summary:	Add new methods consistent with the app policies. It is of concern that these methods have a there is next to no explicit assessment of	apparently been disregar	rded in the development of PC10, and
Decision Sought:	That Council amend the plan to assess th with the RWLP Plan Review process. That the methods 28, 31, 34, 35, 37, 40 fr That the methods 25, 26, 28, 30, 41, 43, 4 Operative Regional Water and Land Plan	om the Operative Regio 45, 47, 48, 51, 52, 62, 65	nal Policy Statement be added
Panel Recommendations:	Reject		

Further	Submission(s)					
	Further Submission No:		6 - 37	Submission Type:	Support	
	Further Submitte	er:	CNI Iwi Land Manag	ement Ltd		
	Submission Sum	nmary:	For the reasons give	n in the original submission.		
	Decision Sought:		As above			
	Panel Recomme	endation:	Reject			
Submiss Submitte	ion Number: er:	75: 172 Federated Fa	rmers of New Zealand		Type: Support in Part	
Submiss	ion Summary:	Add new meth	nod to give effect to re	commended alternate framework, c	consistent with RWLP Method 41	
Decision	Sought:	Add new meth	nod (LR Method 41) a	s outlined within the hardcopy of the	e submission.	
Panel R	ecommendations:	Reject				
Submission Number: 75: 173		75: 173		Submission Type: Su	pport in Part	
Submitter: Fe		Federated Farmers of New Zealand				
Submiss	sion Summary:	Add new meth	new method to provide flexibility for emerging best practice.			
		naking provision for a atly recognised in OVE	process to recognise management ERSEER® .	practices and innovations which		
Panel R	ecommendations:	Reject in part				
Submission Number: 75: 174		75: 174		Submission Type: Op	ppose in Part	
Submitter: Federate		Federated Fa	rmers of New Zealand	t		
Submission Summary: Method 10 C submission?			oss boundary issues ·	We request reasons as to why this	s method is not open for	
Decision Sought: Amend to read: Liaise with Waikato Regional Council and xx District Council to ensure: - Any landowners or territorial authorities in that part of the Rotorua Lake Catchment within the region are encouraged to participate in the development of the relevant sub-catchment Action				ce Catchment within the Waikato		
Panel R	ecommendations:	Reject				

Section: LR M1 Method One

Panel Recommendation

Refer to the body of the report for our recommendation on this section.

Submissions

	12: 9	Submission Type:	Support		
Submitter:	Astrid Coker				
Submission Summary:	Support better flow of information between Regional Council and Rotorua District Councils during the subdivision process so that appropriate mitigation measures can be put in place.				
Decision Sought:	Support. No changes requested.				
Panel Recommendations:	Accept				
Submission Number:	49: 48	Submission Type:	Support		
Submitter:	CNI Iwi Land Management Ltd				
Submission Summary:	Support.				
Decision Sought:	Retain.				
Panel Recommendations:	Accept				
Submission Number:	53: 32	Submission Type:	Support in Part		
Submitter:	Lachlan McKenzie				
Submission Summary:	The intent not clear.				
Decision Sought:	Delete.				
Panel Recommendations:	Reject				
Submission Number:	66: 70	Submission Type:	Oppose		
Submitter:	Lake Rotorua Primary Producers Collective	e			
Submission Summary:	Oppose.				
Decision Sought:	Delete.				
Panel Recommendations:	Reject				
Submission Number:	70: 46	Submission Type:	Support		
Submitter:	The Fertiliser Association of New Zealand				
Submission Summary:	FANZ supports the intent of the method.				
Decision Sought:	Retain as notified.				
Decision Sought: Panel Recommendations:	Accept				
		Submission Type:	Oppose		
Panel Recommendations:	Accept	Submission Type:	Oppose		
Panel Recommendations: Submission Number:	Accept 75: 160				
Panel Recommendations: Submission Number: Submitter:	Accept 75: 160 Federated Farmers of New Zealand				

Section: LR M2 Method Two

Panel Recommendation

We concur with the Regional Council reporting officers' recommendations as contained in their s42A report and additional evidence presented during the hearing.

Submissions

Submission Number:	14: 15	Submission Type:	Support in Part		
Submitter:	Warren Webber				
Submission Summary:	 Are sustainable load targets achievable with other combinations of N & P mitigation. Re-run of ROTAN with revised attenuation factors to confirm catchment targets Continuing focus on the improvement of Overseer 				
Decision Sought:	Improved understanding of the long term sustainable use of in-lake alum. Provide for future work and research priorities - Are sustainable load targets achievable with other combinations of N & P mitigation. - Re-run of ROTAN with revised attenuation factors to confirm catchment targets - Continuing focus on the improvement of Overseer - Improved understanding of the long term sustainable use of in-lake alum.				

Panel Recommendations: Reject

Further Submission(s)					
Further Submiss	Further Submission No:		Submission Type:	Support in Part	
Further Submitte	er:	CNI Iwi Land Mana	gement Ltd		
Submission Su	Submission Summary:		For the reasons given in the original submission CNILML supports adding specific provisions for future work and research priorities to the method.		
Decision Sought:		 Include the following additional future work and research priorities in LR M2 whether sustainable load targets are achievable with other combinations of N & P mitigation. modelling lake inputs with revised attenuation factors to confirm catchment targets. improving the accuracy of Overseer, particularly by improving the accuracy with which Overseer reflects the Lake Rotorua soil conditions and reactions. i.e. relevant local monitoring to support the modelling. improved understanding of the long term sustainable use of in-lake alum. 			
Panel Recomm	Panel Recommendation:				
Submission Number:	Submission Number: 14: 2		Submission Type: S	Support	
Submitter:	Warren We	ebber			
Science rev		view may yet determine	, and reviewable science as the on that the sustainable loads to reach load figures are backed by robust	TLI 4.2 will vary. The critical	
Decision Sought:	Support - N	No relief specified.			
Panel Recommendations:	Accept				

Submission Number:	16: 3	Submission Type: Oppose			
Submitter:	Neil Heathe	r			
Submission Summary:	Council nee nutrients.	ds to acknowledge the significant shifts in science including the significance of internal bec			
Decision Sought:	Council need nutrients.	ds to acknowledge the significant shifts in science including the significance of internal bec			
Panel Recommendations:	Accept in Pa	art			
Submission Number: Submitter:	16: 5 Neil Heathe	Submission Type: Support in Part			
Submission Summary:	Summary: That Council acknowledge the 2017 Science review is intended to review and update all the chan the science and technical context; and that this may necessitate review of the RWLP TLI Objective and/or the RPS load reduction target.				
Decision Sought:	That Council acknowledge the 2017 Science review is intended to review and update all the change the science and technical context; and that this may necessitate review of the RWLP TLI Objective and/or the RPS load reduction target.				
Panel Recommendations:	Accept in Pa	art			
Submission Number:	17: 5	Submission Type: Oppose			
Submitter:	D & A Trust				
Submission Summary:		eview is due to be completed in 2017. It seems ludicrous to implement a bunch of rules that ruled on their head with the science review is completed.			
Decision Sought:	Bring the sci	ience review forward to 2016.			
Panel Recommendations:	Reject				
Further Submission(s))				
Further Submiss	sion No:	7 - 5 Submission Type: Support			
Further Submitte	er:	Alistair and Sarah Coatsworth			
Submission Summary:		The implementation of any rules must be suspended pending the findings of a comprehensive independent review of the water and land science for Lake Rotorua and catchment.			
Decision Sough	t:	As above			
Panel Recomm	endation:	Reject			
Further Submission	on No:	8 – 5 Submission Type: Support			
Further Submitte	er:	Lake Rotorua Primary Producers Collective			
Submission Sur	nmary:	The implementation of any rules must be superseded pending the findings of a comprehensive review of the water and land science for Lake Rotorua and catchment.			

Decision Sought:	As above
Panel Recommendation:	Reject

Submission Number:	19: 8	Submission Type:	Oppose
Submitter:	Dixon Reeves		
Submission Summary:	We do not understand loads and possible restrict farming businesses to their current		
Decision Sought:	Consider the alternative combinations of p dosing.	hosphorus and nitrogen	lake targets in combination with Alum-
	That the Council review the load calculation Adopt best science, ongoing 5 years revie		

mitigation solutions including risks, social, cultural and economic impacts. Another approach which might have a more favorable outcome could be to have sub-catchment groups with a joint target.

Panel Recommendations:	Reject in part			
Submission Number:	20: 2	Submission Type:	Oppose	
Submitter:	Peter McLean and Michelle Rennie			
Submission Summary:	The rules are not fair or equitable. The NDA would be unsustainable.	allowance would effect	ctively halve our stocking rate. Our farm	
Decision Sought:	I request the recalculation of the nitrogen in review to be started in 2017.	put from land use to the	e lake as part of a larger Science	
Panel Recommendations:	Reject			
Submission Number:	24: 2	Submission Type:	Support	
Submitter:	JT & SA Butterworth			
Submission Summary:	We strongly support the progression of the 2017 Science review which must recalculate the sustainable load to the lake and the load of all land use. Taking an evidence based approach leads to more effected and enduring decision making. There are still many unanswered science questions that need to be addressed. It must be robust science, good leadership and planning, not computer modelling that establishes the level of nitrogen and phosphorus to be removed from the lake.			
Decision Sought:	Support Science review - no changes spec	ified.		
Panel Recommendations:	Accept			
Submission Number:	25: 3	Submission Type:	Support in Part	
Submitter:	Paul Lyons			
Submission Summary:	All of the points (a) through (d) should be re considered. The science should be refined "may" since recommendations may not alw	continually and mandat	ted so. Item (e) could be regarded as	
Decision Sought:	Third line down, change the third word to "w	vill" so the sentence rea	ads "These reviews will include:"	
Panel Recommendations:	Accept			

Submissi	ion Number:	26: 20	Su	bmission Type:	Support in Part	
Submitte	mitter: Rotorua Lake		s Council			
the RPS and			the use of adaptive management with a five yearly science reviews and regular reviews of regional plan. RLC would like to see this first review occur as soon as possible. RLC is also at the word "may" implies that a full review will not necessarily be completed.			
Decision	Sought:		2 to replace "these reviews may i le first review will be completed.	nclude" with "these	reviews will include"; and to state 201	
Panel Re	ecommendations:	Accept				
Submissi	ion Number:	37: 3	Su	bmission Type:	Support in Part	
Submitte	r:	Ngati Whaka	ue Tribal Lands Incorporation			
Submissi	ion Summary:		R M2 conditional on the establish e science review process and to l dations.			
Decision	Sought:		R M2 conditional on the establish e science review process and to l dations.			
Panel Re	ecommendations:	Reject				
Further	Submission(s)	-				
-	Further Submiss	ion No:	7 - 22	Submission Type	e: Support	
	Further Submitte	er:	Alistair and Sarah Coatsworth			
	Submission Sum	imary:	For the reasons given in the original submission.			
	Decision Sought	: As above				
[Panel Recomme	endation:	Reject			
-	Further Submiss	ion No:	8 - 23	Submission Type	e: Support	
	Further Submitte	er:	Lake Rotorua Primary Produce	rs Collective		
	Submission Sum	imary:	For the reasons given in the original	ginal submission.		
	Decision Sought	: As above				
[Panel Recomme	endation:	Reject			
-	Further Submiss	ion No:	12 - 21	Submission Type	e: Support	
	Further Submitte	er:	Federated Farmers of New Zea	land		
	Submission Sum	imary:	For the reasons given in the original	ginal submission.		
	Decision Sought	: As above				

Submissic	on Number:	41: 3	Submission Type: Oppose		
Submitter:	ubmitter: Craig Hurst				
Submissic	on Summary:		eed to be reduced after the 2017 science review, the only democratic and economically is for the community/council to buy out those who want to exit at a fair value.		
Decision S	Sought:		nce review scheduled for 2017 includes an independent calculation of the sustainable load Lake Rotorua.		
Panel Red	commendations:	Accept in Par	t		
Further \$	Submission(s)				
	Further Submiss	ion No:	7 - 29 Submission Type: Support		
	Further Submitte	er:	Alistair and Sarah Coatsworth		
	Submission Sum	nmary:	That the science review for 2017 includes an independent calculation of the sustainable load of nutrients to Lake Rotorua.		
	Decision Sought	:	As above		
	Panel Recomme	endation:	Accept in Part		
	Further Submiss	ion No:	8 - 32 Submission Type: Support		
	Further Submitte	er:	Lake Rotorua Primary Producers Collective		
	Submission Sum	nmary:	That the science review for 2017 includes an independent calculation of the sustainable load of nutrients to Lake Rotorua.		
	Decision Sought	:	As above		
	Panel Recomme	endation:	Accept in Part		
Submissic	on Number:	45: 13	Submission Type: Oppose		
Submitter:	:	Wendy and Jo	ohn Roe		
			recalculation of the sustainable load target to Lake Rotorua and the recalculation of the from land use to the Lake as part of a larger Science review to be started in 2017.		
Decision S	Sought:		recalculation of the sustainable load target to Lake Rotorua and the recalculation of the from land use to the Lake as part of a larger Science review to be started in 2017.		
Panel Red	commendations:	Accept in Par	t		
Submissic	on Number:	48: 26	Submission Type: Support		
Submitter:		Parekarangi 1	Frust		
Submissic	on Summary:	Support the T	LI index of 4.2 for Lake Rotorua.		
			LI index of 4.2 for Lake Rotorua. Support review of science every 5 years. Add to this if TL e or below 4.2 then NDA is relaxed for farmers.		
Panel Red	commendations:	Accept in Par	t		
Further \$	Submission(s)				
	Further Submiss	ion No:	7 - 32 Submission Type: Support		
	Further Submitte	er:	Alistair and Sarah Coatsworth		
	Submission Sum	nmary:	For the reasons given in the original submission.		
	Decision Sought	:	As above		
		endation:	Accept in Part		

Eventh en O		0 07	Outputies in Transa	Curra art		
	Submission No:	8 - 37	Submission Type:	Support		
Further S		Lake Rotorua Primary Producers Collective				
	on Summary:	-	For the reasons given in the original submission. As above			
Decision	_					
Panel Re	ecommendation:	Accept in Part				
Submission Numbe	er: 49: 49		Submission Type: Su	pport		
Submitter:	CNI Iwi La	nd Management Ltd				
Submission Summa	ary: Support.					
Decision Sought:	Retain.					
Panel Recommenda	ations: Accept					
Further Submiss	ion(s)					
Further S	Submission No:	14 - 20	Submission Type:	Support		
Further S	Submitter:	Hancock Forest Man	agement (NZ) Ltd			
Submissi	on Summary:	Supports the approa	ch.			
Decision	Sought:	As above				
Panel Re	ecommendation:	Accept				
Submission Number: 53: 1			Submission Type: Op	pose		
Submitter:	Lachlan M	cKenzie				
the lake wate years before Therefore, th cyanobacteri		ater is low because of Alu re Alum dosing was initiat the first and most importa	d Hamilton and other scientists that im dosing but it has to be noted that red. "The limiting nutrient is usually ant step toward improving lake water of external nutrient loading from the turnover.	at the trend started in 2003 severa Phosphorus. (Smith 1983). er quality and managing		
		017 science review be sta		a an an far true consultation with		
Decision Sought:	affected st	akeholders and consensu	rted. That the terms of reference bus the reached by affected parties the incil in changes to the RWLP and R	before appointing reviewers. The		
	affected st results of t	akeholders and consensu	us be reached by affected parties I	before appointing reviewers. The		
Panel Recommenda	affected st results of t ations: Reject	akeholders and consensu	us be reached by affected parties I	before appointing reviewers. The		
Panel Recommenda	affected st results of t ations: Reject	akeholders and consensu	us be reached by affected parties I	before appointing reviewers. The		
Panel Recommenda	affected st results of t ations: Reject sion(s) submission No:	akeholders and consensu his review will direct Coun	us be reached by affected parties to icil in changes to the RWLP and R Submission Type:	pefore appointing reviewers. The PS.		
Panel Recommenda Further Submiss Further S Further S	affected st results of t ations: Reject sion(s) submission No:	akeholders and consensu his review will direct Coun 7 - 23 Alistair and Sarah Co	us be reached by affected parties to icil in changes to the RWLP and R Submission Type:	pefore appointing reviewers. The PS.		
Panel Recommenda Further Submiss Further S Further S	affected st results of t ations: Reject sion(s) Submission No: Submitter: on Summary:	akeholders and consensu his review will direct Coun 7 - 23 Alistair and Sarah Co	us be reached by affected parties to the RWLP and R Submission Type:	pefore appointing reviewers. The PS.		
Panel Recommenda Further Submiss Further S Further S Submissi Decision	affected st results of t ations: Reject sion(s) Submission No: Submitter: on Summary:	akeholders and consensu his review will direct Coun 7 - 23 Alistair and Sarah Co For the reasons given	us be reached by affected parties to the RWLP and R Submission Type:	pefore appointing reviewers. The PS.		
Panel Recommenda Further Submiss Further S Further S Submissi Decision Panel Re	affected st results of t ations: Reject sion(s) Submission No: Submitter: on Summary: Sought:	akeholders and consensu his review will direct Coun 7 - 23 Alistair and Sarah Co For the reasons given As above	us be reached by affected parties to the RWLP and R Submission Type:	pefore appointing reviewers. The PS.		
Panel Recommenda Further Submiss Further S Further S Submissi Decision Panel Re	affected st results of t ations: Reject sion(s) Submission No: Submitter: on Summary: Sought: ecommendation: Submission No:	akeholders and consensu his review will direct Coun 7 - 23 Alistair and Sarah Co For the reasons given As above Reject 8 - 24	us be reached by affected parties h ncil in changes to the RWLP and R Submission Type: patsworth n in the original submission.	Support		
Panel Recommenda Further Submissi Further S Submissi Decision Panel Re Further S Further S Further S	affected st results of t ations: Reject sion(s) Submission No: Submitter: on Summary: Sought: ecommendation: Submission No:	akeholders and consensu his review will direct Coun 7 - 23 Alistair and Sarah Co For the reasons given As above Reject 8 - 24 Lake Rotorua Primar	us be reached by affected parties h ncil in changes to the RWLP and R Submission Type: batsworth in in the original submission. Submission Type:	Support		
Further S Submissi Decision Panel Re Further S Further S	affected st results of t ations: Reject sion(s) Submission No: Submitter: on Summary: Sought: ecommendation: Submission No: Submitter: on Summary:	akeholders and consensu his review will direct Coun 7 - 23 Alistair and Sarah Co For the reasons given As above Reject 8 - 24 Lake Rotorua Primar	us be reached by affected parties h ncil in changes to the RWLP and R Submission Type: batsworth in the original submission. Submission Type: y Producers Collective	Support		

	Further Submission No:	12 - 22	Ś	Submission Type	e:	Support		
	Further Submitte	er:	Federated Farme	rs of New Zealand	ł			
	Submission Sum	nmary:	A catchment land	owners/stakeholde	er group should	overse	ee the science review	
	process. Decisio	n Sought:	As above					
[Panel Recomme	endation:	Reject					
Submissio	on Number:	53: 33		Submi	ssion Type:	Supp	port in Part	
Submitter	:	Lachlan Mo	Kenzie					
Submissio	on Summary:	Improve for	clarity and completer	ness. Footnote ne	eds to provide a	more	specific reference.	
Decision	Sought:	the objectiv					n the science that determ d Plan for Lake Rotorua or	
Panel Re	commendations:	Accept						
Submissio	on Number:	53: 89		Submi	ssion Type:	Opp	ose	
Submitter	:	Lachlan Mo	Kenzie					
Submissio	on Summary:	of great cor should add stated that	cern that the target loress reductions of P a	bad of 435T Nitrog as the lake is now n of Nitrogen betw	en has been "ta phosphorus limi een the root zor	iken as ted. Ui	as a 2032 aspirational targ s read". The lake scientific ntil very recently it has bee I the lake. OVERSEER® \	data n
with a The r That		with affecte The results That a fully	d stakeholders and o of this review will dire	consensus be read ect Council in char s to be done on fea	hed by affected ges to the RWL sibility and effe	d partie _P and	e open for true consulta es before appointing review RPS. ess of the range of oxygen	wers.
Panel Re	commendations:	Reject						
Submissio	on Number:	58: 31		Submi	ssion Type:	Opp	ose	
Submitter	:	Max Doug	as					
Submissio	on Summary:	our industry products, a I support th	 best practices, our ond listening to central 	wn industry repres government scier e input, especially	sentatives, inform tee "advisors" ha science giving	mation as not	ute. Clearly we do. Relyir from vendors selling us been good enough ice and answering question	
air - o - w - w - w - A		aim to tell fa - our soils: - which pas - which con - Are there	armers how to make to toral areas around the servation areas show	e lake have the lan e lake have the hig the lowest leaching we could aim that	d available, inclu ghest leaching ng rates avoid overload	uding, rates ing the	trics. Undertake studies w but not limited to: e underlying biological sys	
Panel Re	commendations:	Accept in F	Part					
Further	Submission(s)							
	Further Submiss	ion No:	6 - 39	Ş	Submission Typ	e:	Support	
	Further Submitte		CNI Iwi Land Mar	nagement Ltd				
	Submission Sum	nmary:		the addition of un sters can make bes			support land use suitabili ilable.	ty so
	Decision Sought	:	As above				-	
								-

	Panel Recomm	endation:	Accept in Part			
Submiss	ion Number:	62: 1	Submission Type: Support in Part			
Submitte	r:	Sharon Morr	ell			
Submiss	ion Summary:		not behaved as predicted in early models. It is important to have the basis for these models kamined and the implications of any new information/understanding to carry through to policy b.			
Decision	Sought:	Strengthen th	nis section to state that analysis recommendations etc. WILL be done (not "may").			
Panel Re	ecommendations:	Accept				
Further	Submission(s)					
	Further Submiss	sion No:	12 - 19 Submission Type: Support			
	Further Submitte	er:	Federated Farmers of New Zealand			
	Submission Sur	nmary:	For the reasons given in the original submission.			
	Decision Sough	t:	As above			
	Panel Recomm	endation:	Accept			
Submiss	ion Number:	64: 1	Submission Type: Support in Part			
Submitte	r:	DairyNZ and	Fonterra Co-operative Group Limited			
Submiss	ion Summary:	RPS and Re	e intent to regularly review and publish the science used to derive the limits set out on the egional Water and Land Plan every five years and respond to any recommendations made sequent community consultation and adaptive management.			
science will managemen unlikely to n - Clarify in tl LR M2 (a-e)		science will b management unlikely to me - Clarify in th LR M2 (a-e).	tainty in the Plan that the first major review of the lake and catchment water quality be carried out in 2017, and that the results of this review will form the basis for an adaptive approach if the findings suggest that the NDA targets and associated rules framework are beet the 2032 lake targets. e Plan that each scientific review will assess all scientific and policy aspects listed in method the review will include peer review from independent scientists.			
Panel Re	ecommendations:	Accept				
Further	Submission(s))				
	Further Submiss	sion No:	6 - 40 Submission Type: Support			
	Further Submitte	er:	CNI lwi Land Management Ltd			
	Submission Sur	nmary:	For the reasons given in the original submission.			
	Decision Sough	t:	As above			
	Panel Recomm	endation:	Accept			

	Further Submission No:		8 - 33	Submission Type:	Support		
	Further Submit	ter:	Lake Rotorua Primary Producers Collective				
	Submission Summary: Decision Sought:			ch scientific review will assess -e). Clarify that the review will	all scientific and policy aspects include peer review from		
			As above				
	Panel Recomm	nendation:	Accept in Part				
	Further Submis	sion No:	12 - 20	Submission Type:	Support		
	Further Submit	ter:	Federated Farmers of New	w Zealand			
	Submission Su	mmary:	For the reasons given in the	ne original submission.			
	Decision Sough	nt:	As above				
	Panel Recomm	endation:	Accept				
	Further Submis	sion No:	12 - 48	Submission Type:	Support		
	Further Submit	ter:	Federated Farmers of New	w Zealand			
	Submission Summary:		For the reasons given in the original submission. Federated Farmers recommend PC10 maintain maximum flexibility to recalibrate the approach in response to science and policy reviews and that the plan needs to specify that a full science review will be undertaken in 2017 before consents become operative. Support for 2032 targets is contingent on the results of the science review as to whether these still represent the most cost-effective and efficient way of meeting desired outcomes for the lake. The load/allocation numbers referenced in PC10 cannot be relied on for the imposition of rules in advance of the 2016 ROTAN review and the 2017 Science Review.				
	Decision Sough	nt:	As above				
	Panel Recomm	endation:	Accept in Part				
ubmiss	sion Number:	66: 1	Submission Type: Oppose in Part a Primary Producers Collective				
ıbmitte	er:	Lake Rotoru					
ubmiss	ubmission Summary: We are anxie must be fair & sound & robu more effectiv need to be ac		& equitable. The economic c ust science that is regularly u ve and enduring decision mal addressed. It must be robust s	osts to farmers and the wider pdated and reviewed. An evid king. There are still many unar	ence-based approach leads to nswered science questions that anning, not computer modelling		
ecision Sought: That the scie Rotorua and that the targe		I that the nutrients generated		the sustainable load to Lake recalculated. Our real concern is e terms of reference be open for			
			with all stakeholders and tha	t consensus is reached with a			
	Recommendations	consultation					
nel R	Recommendations	consultation Accept in Pa					
nel R		consultation Accept in Pa					
inel R	r Submission(s	consultation Accept in Pa) sion No:	art	t consensus is reached with a	ffected parties.		
inel R	r Submission(s	consultation Accept in Pa) sion No: ter:	art 12 - 23 Federated Farmers of Nev	t consensus is reached with a Submission Type: v Zealand	ffected parties.		
nel R	r Submission(s Further Submis Further Submit	consultation Accept in Pa i) sion No: ter: mmary:	art 12 - 23 Federated Farmers of Nev	t consensus is reached with a Submission Type: v Zealand	ffected parties.		

Submission Number:	66: 71	Submission Type:	Support in Part
Submitter:	Lake Rotorua Primary Producers Collection	ve	
Submission Summary:	Improve clarity and completeness.		
Decision Sought:	Amend to 'publish the 'scientific data' t the Regional Water and Land Plan for Lak		
Panel Recommendations:	Reject		
Submission Number:	67: 3	Submission Type:	Oppose
Submitter:	Karl Weaver		
Submission Summary:	The sustainable load to Lake Rotorua has	not been verified by ac	tual scientific truth testing since then.
Decision Sought:	I request the recalculation of the sustaina Review to be started in 2017.	ble load target to Lake I	Rotorua as part of a larger Science
Panel Recommendations:	Accept in Part		
Submission Number:	70: 6	Submission Type:	Support in Part
Submitter:	The Fertiliser Association of New Zealand	1	
Submission Summary:	Provision is required within the Proposed management. Locking in nitrogen loss val change does not allow for updated scienc	ues and nitrogen load v	alues for the Lake within the plan
Decision Sought:	Provision is required within the Proposed management.	Plan Change to provide	for new science to inform adaptive
Panel Recommendations:	Accept		
Submission Number:	70: 47	Submission Type:	Support in Part
Submitter:	The Fertiliser Association of New Zealand	ł	
Submission Summary:	Under the principles of adaptive managent that review of the RPS targets should also		
Decision Sought:	Retain as notified.		
Panel Recommendations:	Accept		
Submission Number:	75: 161	Submission Type:	Support in Part
Submitter:	Federated Farmers of New Zealand		
Submission Summary:	Improve clarity and completeness.		
Decision Sought:	Amend to read: 'LR M2 Regional Council objectives and limits set in the RPS and th yearly basis 'from 2017'. These reviews m	ne Regional Water and I	he science that determined the Land Plan for Lake Rotorua on a five
Panel Recommendations:	Accept		
Submission Number:	78: 1	Submission Type:	Oppose
Submitter:	Tony and Joanna Carr		
Submission Summary:	Science, innovation and technology is evolution to understanding the effects and impacts of its complex biological system and its legal knowledge more urgent. To saddle a community with these rules for prudent for BOPRC to review their position that the lake has reached its target TLI for fact P limited.	of nutrient discharge nat cy load of nutrients of N or life is in our opinion m n on PC10 given the sci	tionally. In this catchment, the lake with and P makes quick uptake of isguided and dangerous. It would be ence review that is due in 2017, the fact

Decision Sought:	Park PC10 until the science review scheduled for 2017 is completed. a new calculation of the sustainable load to Lake Rotorua and that the current land uses is newly calculated. Our real concern is that the targ since its inception.	e nutrients generated from all
Panel Recommendations:	Reject	
Submission Number:	80: 10 Submission Type: C	oppose in Part
Submitter:	Te Paiaka Lands Trust	
Submission Summary:	We must ensure that we work with science and ensure there is capac science tells us new answers. We must not be fixed in the setting of ta research is telling us differently.	
Decision Sought:	We must ensure adequate reviews.	
Panel Recommendations:	Accept	
Submission Number:	81: 4 Submission Type: S	upport in Part
Submitter:	Jamie and Chris Paterson	
Submission Summary:	We support a science review being undertaken in 2017. Council must available', my understanding is this best science was done in 1986 ar The science review being undertaken in 2017 must be a recalculation thinking by a new and independent science team.	nd has not been recalculated since.
Decision Sought:	That the science review scheduled for 2017 includes a new calculatio Rotorua and that the nutrients generated from all current land uses is	
Panel Recommendations:	Accept in Part	
Submission Number:	82: 16 Submission Type: C	oppose
Submitter:	Stuart Morrison	
Submission Summary:	The most important part of PC10 for me is the commitment for review is that sustainable loads of N and P are uncertain and need revision. Sufficiently explicit.	
Decision Sought:	State in LR M2 what will be reviewed.	
Panel Recommendations:	Accept	
Submission Number:	82: 18 Submission Type: S	upport
Submitter:	Stuart Morrison	
Submission Summary:	I strongly support the commitment to ongoing reviews and adaptive r	management.
Decision Sought:	No change requested.	
Panel Recommendations:	Accept	
Submission Number:	83: 5 Submission Type: C	Oppose
Submitter:	Bushlands Estate Limited and Adolle Farms Limited	
Submission Summary:	The sustainable load to Lake Rotorua was first estimated in the early actual scientific truth testing since then.	1980's & has not been verified by
Decision Sought:	I request the recalculation of the sustainable load target and the recal land use to the Lake as part of a larger Science Review to be started	
Panel Recommendations:	Accept in Part	

Panel Recommendation	on	
See Section on LR M2		
Submissions		
Submission Number:	49: 50	Submission Type: Support
Submitter:	CNI Iwi Lan	d Management Ltd
Submission Summary:	Support.	
Decision Sought:	Retain.	
Panel Recommendations:	Accept	
Further Submission(s)	
Further Submiss	sion No:	14 - 21 Submission Type: Support
Further Submitt	er:	Hancock Forest Management (NZ) Ltd
Submission Sur	nmary:	Supports the approach.
Decision Sough	t:	As above
Panel Recomm	endation:	Accept
Submission Number:	53: 34	Submission Type: Support in Part
Submitter:	Lachlan Mc	Kenzie
Submission Summary:	Improve for	clarity and completeness. Footnote needs to provide a more specific reference.
Decision Sought:	Chlorophyll	ead: Review of trends in Lake water quality attributes including nitrogen, phosphorus, a, algal blooms, clarity, trophic level index for in-lake, inflows, and outflow where relevant;' e health of indigenous fauna and flora and review of interactions and impacts of introduced ora.'
Panel Recommendations:	Reject	
Submission Number:	66: 72	Submission Type: Support in Part
Submitter:	Lake Rotoru	a Primary Producers Collective
Submission Summary:	Improve cla	rity and completeness.
Decision Sought:		follows 'where relevant; review of the health of indigenous fauna and flora and review of and impacts of introduced fauna and flora.'
Panel Recommendations:	Reject	

Submitter:	Federated Farmers of New Zealand
Submission Summary:	Improve clarity and completeness.
Decision Sought:	Amend as follows:
	Review of trends in Lake water quality attributes including nitrogen, phosphorus, Chlorophyll a, algal blooms, clarity, and trophic level index for in-lake, inflows, and outflow where relevant; review of the health of indigenous fauna and flora and review of interactions and impacts of introduced fauna and flora.

Panel Recommendations: Reject

Section: LR M2(b)

Panel Recommendation	
See Section on LR M2 above.	

Submissions

Submission Number:	49: 51	Submission Type:	Support
Submitter:	CNI Iwi Land Management Ltd		
Submission Summary:	Support.		
Decision Sought:	Retain.		
Panel Recommendations:	Accept		

Further Submission(s)

Fuithe					
	Further Submiss	ion No:	14 - 22	Submission Type:	Support
	Further Submitte	er:	Hancock Forest Managem	nent (NZ) Ltd	
	Submission Sum	nmary:	Supports the approach.		
	Decision Sought	:			
	Panel Recomme	endation:	Accept		
Submiss	sion Number:	53: 35		Submission Type:	Support in Part
Submitte	er:	Lachlan Mck	Kenzie		
Submise	sion Summary:	Improve for c	clarity and completeness. Fo	otnote needs to provide a r	nore specific reference.
Decisior	n Sought:	Amend to rea	ad: Review of progress towa	rds achieving the RWLP T	I objective.
Panel R	Recommendations:	Reject			
Submise	sion Number:	66: 73		Submission Type:	Support in Part
Submitte	er:	Lake Rotorua	a Primary Producers Collect	ive	
Submiss	sion Summary:	Improve clari	ty and completeness.		
Decisior	n Sought:	Amend as fo	llows: (b)Review of progress	towards achieving the RW	LP TLI objective.
Panel R	Recommendations:	Reject			
Submiss	sion Number:	75: 163		Submissio	on Type: Support in Part
Submitte	er:	Federated Fa	armers of New Zealand		
	sion Summary: n Sought:		ity and completeness. llows: (b) Review of progress	s towards achieving the RV	VLP TLI objective.
Panel R	Recommendations:	Reject			

Submission Number:	82: 4	Submission Type:	Oppose	
Submitter:	Stuart Morrison			
Submission Summary:	The claim made in first sentence p2 PC10 science available' is out of date.	introduction that '435 to	nnes is based on the best	
Decision Sought:	Update the claim.			
Panel Recommendations:	Reject			
				1049

Section: LR M2(c)

Panel Recommendation

See Section on LR M2 above.

Submissions

Submission Number:	17: 10 5	Submission Type:	Oppose
Submitter:	D & A Trust		
Submission Summary:	A TLI has been set at 4.2 but there appears t result of Alum dosing this level has been read TLI of 4.2 had never been reached. We show TLI that is not scientifically valid.	ched. At a science pre	esentation the researcher noted that the
Decision Sought:	A sound review of the 4.2 TLI is undertaken a	and a realistic and ach	nievable target is set.
Panel Recommendations:	Reject		
Submission Number:	20: 4	Submission Type:	Oppose
Submitter:	Peter McLean and Michelle Rennie		
Submission Summary:	The sustainable load to Lake Rotorua was fir actual scientific testing since.	st estimated in the ea	rly 1980's and has not been verified by
Decision Sought:	I request the recalculation of the sustainable biodiverse system that encompasses both N		otorua using robust, evidence based
Panel Recommendations:	Reject		
Submission Number:	23: 3	Submission Type:	Oppose
Submitter:	Roger and Norreen Martin		
Submission Summary:	The sustainable load to Lake Rotorua was fir since.	st estimated in the ea	rly 1980's and has not been verified
Decision Sought:	I request the recalculation of the sustainable nitrogen input from land use to the Lake as p	•	
Panel Recommendations:	Reject		
Submission Number:	23: 4	Submission Type:	Oppose
Submitter:	Roger and Norreen Martin		
Submission Summary:	The sustainable load to Lake Rotorua was fir since.	st estimated in the ea	rly 1980's and has not been verified
Decision Sought:	I request the recalculation of the sustainable nitrogen input from land use to the Lake as p		
Panel Recommendations:	Reject		
Submission Number:	24.3	Submission Type:	

Submitte	r.	.IT & SA Butt	erworth			
	ion Summary:	The lake has because the principles. Al affordable me	& SA Butterworth the lake has a TLI of 4.2 and has down for the past 3 years. It has consistently stayed at that cause the farming community are more informed of the responsibilities of 'Best Farm Practice' inciples. All sectors of the community should be expected to implement reasonable, practicable and fordable measures. The RPS is clear that is the lake requires further nutrient reductions then this rries public benefit and should be funded accordingly.			
Decision	Sought:	All sectors of measures.	the community should be expected to implement reasonable, practicable and affordable			
Panel Re	ecommendations:	Accept in Pa	rt			
Submiss	ion Number:	24: 11	Submission Type: Oppose			
Submitte	er:	JT & SA Butt	erworth			
Submissi	ion Summary:		nat the setting of the target for the sustainable nitrogen load to Lake Rotorua was done ommunity having any understanding of the economic and social impacts.			
Decision	Sought:	That council parks PPC10 and works with the catchment farmers in prioritising sub-catchment delivering significant nutrient loads to the lake; assist sub-catchment communities in developing sub-catchment action plans to prioritise critical source areas significant at sub-catchment scale and cost effective interventions for reducing high nutrient base flow and flood flow loads to the lake; and that these interventions would appropriately being considered by the incentives fund.				
Panel Re	ecommendations:	Reject				
Further	Submission(s)	1				
	Further Submissi Further Submitter Submission Sun	r:	7: 7 Submission Type Support Alistair and Sarah Coatsworth The general community did not and still does not have an understanding of the economic and social impacts of this proposal.			
	Decision Sought: As above					
	Panel Recomme	endation:	Reject			
	Further Submiss	ion No:	8 - 9 Submission Type: Support			
	Further Submitte	er:	Lake Rotorua Primary Producers Collective			
	Submission Sun	nmary:	The general community did not and still does not have an understanding of the economic and social impacts of this proposal.			
	Decision Sought	::	As above			
	Panel Recomme	endation:	Reject			
Submiss	ion Number:	27: 6	Submission Type: Oppose			
Submitte	er:	Gro2 Ltd				
Submiss	ion Summary:	We have bee already been	n told that the target to achieve a TLI of 4.2 is a sustainable load of 435t of N. The TLI has achieved with a load of 658 ton of N. The tolerance for nitrogen has been set low.			
Decision Sought: What is needed is independent, peer reviewed science.		What is need	ed is independent, peer reviewed science.			
	ecommendations:	Reject in par	í			
Panel Re						
	Submission(s)					
	Further Submiss		7 - 16 Submission Type: Support			
		ion No:	7 - 16 Submission Type: Support Alistair and Sarah Coatsworth			
	Further Submiss	ion No: er:				

Panel Recommendation:

Reject

I	Further Submissi	on No:	8 - 13	Submission Type:	Support
I	Further Submitte	r:	Lake Rotorua Primary Proc	ducers Collective	
:	Submission Summary:				sideration of the effects of the weir sequent to the introduction of trout.
I	Decision Sought:		As above		
	Panel Recomme	ndation:	Reject		
Submissior	n Number:	48: 25		Submission Type: S	Support
Submitter:		Parekarangi -	Trust		
Submissior	n Summary:		I is already being achieved. is already being achieved.	There is currently no reasor	n to change on-farm practice where
Decision S	Sought:		LI index of 4.2 for Lake Roto e or below 4.2 then NDA is re		nce every 5 years. Add to this if TLI
Panel Rec	commendations:	Accept in Par	t		
Submissior	n Number:	49: 52		Submission Type: S	support in Part
Submitter:		CNI Iwi Land	Management Ltd		
Submissior	n Summary:	identifying we	odels have assumptions tha aknesses in the models, to esses and constants.		ensitivity analysis assists in ection and on-ground verification of
Decision S	Sought:	Add (c)(iv) sc	enario runs of the lake mode	I, ROTAN or OVERSEER®	, for sensitivity analysis.
Panel Rec	commendations:	Accept			
Further S	Submission(s)				
l	Further Submissi	on No:	14 - 23	Submission Type:	Support
I	Further Submitte	r:	Hancock Forest Managem	ent (NZ) Ltd	
;	Submission Sum	imary:	Supports the approach.		
I	Decision Sought:		As above		
	Panel Recomme	ndation:	Accept		
Submissior	n Number:	66: 74		Submission Type: S	upport in Part
Submitter:		Lake Rotorua	Primary Producers Collection	ve	
Submissior	n Summary:	Improve clarit	y and completeness.		
Decision S	Sought:	Amend to '	This will necessitate:'		
Panel Rec	commendations:	Reject			
Section:	LR M2(c)(i	i)			1050
_					

Panel Recommendation

See Section on LR M2 above.

Submissions

Submission Number:	53: 36	Submission Type:	Support in Part
Submitter:	Lachlan McKenzie		
Submission Summary:	Improve for clarity and completeness. Foo	tnote needs to provide a	more specific reference.

Decision	Sought:	phosphorous			sor model), including nitrogen and s by sub-catchment, including		
Panel Re	ecommendations:	Reject					
Further	Further Submission(s)						
	Further Submis	sion No:	6 – 41	Submission Type:S	upport		
	Further Submitte	er:	CNI Iwi Land Manageme	ent Ltd			
	Submission Sum	nmary:	For the reasons given in	the original submission.			
	Decision Sought	:	As above				
	Panel Recomme	endation:	Reject				
Submissi	on Number:	66: 75		Submission Type:	Support in Part		
Submitter	r:	Lake Rotorua	a Primary Producers Colle	ctive			
Submissi	on Summary:	Improve clari	ity and completeness.				
Decision	Sought:	Amend to:	'including nitrogen and pho	osphorous loss rates,'			
Panel Re	ecommendations:	Reject					
Submissi	on Number:	75: 164		Submission Type:	Support in Part		
Submitter	r:	Federated Fa	armers of New Zealand				
Submissi	on Summary:	Improve clari	ity and completeness.				
Decision	Sought:	Amend to read: (ii) a review and rerun of ROTAN (or any successor model), including nitrogen and phosphorous loss rates, groundwater trends and attenuation rates by sub-catchment, including OVERSEER® or similar estimates;					
Panel Re	ecommendations:	Reject					
Section	n: LR M2(c)(i	iii)			1051		

Panel Recommendation

See Section on LR M2 above.

Submissions

Submission Number:	53: 37	Submission Type:	Support in Part		
Submitter:	Lachlan McKenzie				
Submission Summary:	Improve for clarity and completeness. For	otnote needs to provide a	a more specific reference.		
Decision Sought:	Amend to read: (iii) an assessment of the efficiency and risks of alum dosing and an assessment of land-based or catchment-based phosphorus loss mitigation.				
Panel Recommendations:	Reject				
Submission Number:	66: 76	Submission Type:	Support in Part		
Submission Number: Submitter:	66: 76 Lake Rotorua Primary Producers Collecti	51	Support in Part		
		51	Support in Part		
Submitter:	Lake Rotorua Primary Producers Collecti	ive			

Submission Number: Submitter:	75: 165 Federated Farmers of New Zealand	Submission Type: Support in Part
Submission Summary:	Improve clarity and completeness.	
Decision Sought:	Amend to read: (iii) an assessment of the efficacy and based or catchment-based phosphorus loss mitigation	
Panel Recommendations:	Reject	

Section: LR M2(d)

Panel Recommendation

See Section on LR M2 above.

Submissions

Submission Number:	37: 2	Submission Type:	Support in Part		
Submitter:	Ngati Whakaue Tribal Lands Incorporation	n			
Submission Summary:	Support for LR M2 (d) conditional on the design and funding of new science (including trials) to answer questions not answered by the review of literature.				
Decision Sought:	Support for LR M2 (d) conditional on the design and funding of new science (including trials) to answer questions not answered by the review of literature.				
Panel Recommendations:	Accept in Part				
Submission Number:	49: 53	Submission Type:	Support		
Submitter:	CNI lwi Land Management Ltd				
Submission Summary:	Support.				
Decision Sought:	Retain.				
Panel Recommendations:	Accept				

Further Submission(s)

Further Submission No:	14 - 24	Submission Type:	Support	
Further Submitter:	Hancock Forest Management (NZ) Ltd			
Submission Summary:	Supports the approach.			
Decision Sought:	As above			
Panel Recommendation:	Accept			
-				

Section: LR M2(e)

Panel Recommendation

See Section on LR M2 above.

Submissions

Submission Number:	49: 54	Submission Type: Support
Submitter:	CNI Iwi Land Management Ltd	
Submission Summary:	Support.	
Decision Sought:	Retain.	
Panel Recommendations:	Accept	

1053

Further	Submission(s)					
	Further Submission No: Further Submitter:		14 - 25	Submission Type	e: Support	
			Hancock Forest M	lanagement (NZ) Ltd		
	Submission Sum	nmary:	Supports the appr	oach.		
	Decision Sought	:	As above	As above		
	Panel Recomme	endation:	Accept			
Submissi	ion Number:	53: 38		Submission Type:	Support in Part	
Submitte	r:	Lachlan Mc	Kenzie			
Submissi	ion Summary:	Improve for	clarity and completen	ess. Footnote needs to provide a	more specific reference.	
Decision	Sought:			ns 'to Council including for any neight the targets or loads materially	cessary amendments to the RPS and alters.'	
Panel Re	ecommendations:	Accept in P	art			
Submissi	ion Number:	66: 77		Submission Type:	Support in Part	
Submitte	r:	Lake Rotoru	a Primary Producers	Collective		
Submissi	ion Summary:	Improve cla	rity and completeness	S.		
Decision	Sought:	Amend to (e)Recommendations 'to Council including for any necessary amendments to the RPS and the RWLP if the targets or loads materially alters'.				
Panel Re	ecommendations:	Accept in P	art			
Submissi	ion Number:	75: 166		Submission Type:	Support in Part	
Submitte	r:	Federated F	Farmers of New Zeala	and		
Submissi	ion Summary:	Improve cla	rity and completeness	S.		
Decision	Sought:	Amend to read: (e) Recommendations to Council including for any necessary amendments to the RPS and the RWLP if the science supporting the targets or loads materially alters.'			ndments to the RPS and the RWLP if	

Section: LR M3 Method Three

Panel Recommendation

We concur with the Regional Council reporting officers' recommendations as contained in their s42A report and additional evidence presented during the hearing.

Submissions

Submission Number:	26: 38	Submission Type:	Support in Part	
Submitter:	Rotorua Lakes Council			
Submission Summary:	RLC supports the use of adaptive management with a five yearly science reviews and regular reviews of the RPS and regional plan. RLC would like to see this first review occur as soon as possible. RLC is also concerned that the word "may" implies that a full review will not necessarily be completed.			
Decision Sought:	Amend LR M2 to replace "these reviews may include" with "these reviews will include"; and to state 2017 as the year the first review will be completed.			
Panel Recommendations:	Accept			

Submission Number:	49: 55	Submission Type:	Support in Part
Submitter:	CNI Iwi Land Management Ltd		
Submission Summary:	LR M3 needs to be clearly locked to the c into them to provide for this response.	onsents, and the consen	ts need to have review conditions built
Decision Sought:	Amend toand a review of consent cond R10, LR R11 and LR R12 are calibrated to		

Panel Recommendations: Accept in Part

Further Submission(s		
Further Submiss	sion No:	14 - 26 Submission Type: Support
Further Submitt	er:	Hancock Forest Management (NZ) Ltd
Submission Sur	nmary:	Supports the approach and amendment sought by CNI lwi Management Ltd.
Decision Sough	t:	As above
Panel Recomm	endation:	Accept in Part
Submission Number:	53: 39	Submission Type: Support in Part
Submitter:	Lachlan Mck	Kenzie
Submission Summary:	Support - im	nportant for this to be a public process.
Decision Sought:	Retain.	
Panel Recommendations:	Accept	
Submission Number:	70: 48	Submission Type: Support
Submitter:	The Fertilise	er Association of New Zealand
Submission Summary:	FANZ suppo	orts the intent of the method.
Decision Sought:	Retain as no	otified.
Panel Recommendations:	Accept	
Submission Number:	75: 167	Submission Type: Support
Submitter:	Federated Fa	Farmers of New Zealand
Submission Summary:	Important for	or this to be a public process.
Decision Sought:	Retain.	
Panel Recommendations:	Accept	
Panel Recommendations:	Accept	

Section: LR M4 Method Four

Panel Recommendation

We concur with the Regional Council reporting officers' recommendations as contained in their s42A report and additional evidence presented during the hearing

Panel Reason

Submissions

Submission Number:	12: 10	Submission Type:	Support
Submitter:	Astrid Coker		
Submission Summary:	Support the monitoring of permitted activit problem emanated from the pumping of ra		

not created by farmers. For farmers under practical environmental mitigation measures on their property at their expense the use of consultants, compliance costs, OVERSEER® files and other bureaucracy should be met by the Regional Council.

Small increases in rates to cover compliance costs. Regular and timely updates on scientific information. Regional Council involvement in research funding applications.		
Accept in Part		
26: 39 Submission Type: Support in Part		
Rotorua Lakes Council		
RLC supports the use of adaptive management with a five yearly science reviews and regular reviews of the RPS and regional plan. RLC would like to see this first review occur as soon as possible. RLC is also concerned that the word "may" implies that a full review will not necessarily be completed.		
Amend LR M2 to replace "these reviews may include" with "these reviews will include"; and to state 2017 as the year the first review will be completed.		
Accept		
49: 56 Submission Type: Support in Part		
CNI Iwi Land Management Ltd		
Far too vague at present and does not identify course of likely action.		
Revise to add: this may include initiation of a plan change and a review of thresholds for permitted activities.		
Accept in Part		
ion No: 14 - 27 Submission Type: Support		
r: Hancock Forest Management (NZ) Ltd		
mary: For the reasons given in the original submission.		
: As above		
endation: Accept in Part		
53: 40 Submission Type: Support in Part		
Lachlan McKenzie		
Amend for consistency with integrated intent. The reference to developing technologies is not clear.		
Amend to read: Regional Council will monitor permitted activities and any developing technologies to ensure that any related risks of nutrient loss to the catchment are understood and acted on if necessary.		
Accept		
ion No: 6 - 42 Submission Type: Support		
er: CNI Iwi Land Management Ltd		
The amendments proposed by this submission would ensure that nutrient pollutants other than nitrogen are also considered.		
: As above		
endation: Accept		
66: 78 Submission Type: Support in Part		
Lake Rotorua Primary Producers Collective		
Improve clarity and completeness.		

Decision Sought:	Amend to 'risks of nutrient loss to the	catchment'		
Panel Recommendations:	Accept			
Submission Number:	70: 49	Submission Type:	Oppose in Part	
Submitter:	The Fertiliser Association of New Zealand			
Submission Summary:	The method should not direct action to am	end permitted activity v	vithout following formal process.	
Decision Sought:	Amend LR M4 as follows: Regional Council will monitor permitted activities and any developing technologies to ensure that any related risks of nitrogen loss to the catchment are understood and to inform future plan changes as required.			
Panel Recommendations:	Accept in Part			
Submission Number: Submitter:	75: 168 Federated Farmers of New Zealand	Submis	ssion Type: Oppose in Part	
Submitter:	Federated Farmers of New Zealand	nt. The reference to de developing technologi itted activities and any	eveloping technologies is not clear. es' developing technologies to ensure that	

Section: LR M5 Method Five

Panel Recommendation

Refer to the body of our report for our recommendations on this section.

Panel Reason

Submissions

Submission Number:	12: 11	Submission Type:	Support
Submitter:	Astrid Coker		
Submission Summary:	Support the monitoring of permitted activity problem emanated from the pumping of r not created by farmers. Whilst farmers ur property at their expense the use of const bureaucracy should be met by the Region	aw sewage into Lake Ro ider practical environmer ultants, compliance cost	torua by the District Council and was ntal mitigation measures on their
Decision Sought:	Small increases in rates to cover complia Regional Council involvement in research		imely updates on scientific information.
Panel Recommendations:	Accept in Part		
Submission Number:	25: 4	Submission Type:	Support
Submitter:	Paul Lyons		
Submission Summary:	It is vital that the Regional Council stays of nitrogen discharge to the community. The come at some considerable initial cost to this community pain and see the process	aim of a cleaner lake er members of our commu	nvironment we can all be proud of may nity. Regional Council needs to respect
Decision Sought:	Support - No changes requested.		
Panel Recommendations:	Accept		
Submission Number:	49: 57	Submission Type:	Support
Submitter:	CNI Iwi Land Management Ltd		

Submission Summary:	Support.			
Decision Sought:	Retain.			
Panel Recommendations	Accept			
Further Submission(s)			
Further Submis	sion No:	14 - 28	Submission Type:	Support
Further Submit	ter:	Hancock Forest Managemen	t (NZ) Ltd	
Submission Su	mmary:	Support. Decision		
Sought:		As above		
Panel Recomm	endation:	Accept		
Submission Number:	62: 6		Submission Type: Op	pose
Submitter:	Sharon Morre	II		
Submission Summary:		action to achieve outcomes stringness of others to get involve		fts confidence in the processes es.
Decision Sought:	those that eith) Support sub-catchment land er affect or are affected by lak afforts to improve the TLI of La	e health to facilitate local cr	r) that include all land owners and oss-sector/community
Panel Recommendations	Accept in Part	t		
Further Submission(s)			
Further Submis	sion No:	7 - 30	Submission Type:	Support in Part
Further Submit	ter:	Alistair and Sarah Coatswort	h	
Submission Su	mmary:			ps to facilitate local cross-sector / wish to do this outside of a Rules
Decision Sougl	nt:	As above		
Panel Recomm	endation:	Accept in Part		
Further Submis	sion No:	8 - 34	Submission Type:	Support in Part
Further Submit	ter:	Lake Rotorua Primary Produ	cers Collective	
Submission Su	mmary:	community collaborative effo	ts to improve the Lake but ramework at this early stag	ps to facilitate local cross-sector / wish to explore sub catchment e of their development and they sary.
Decision Sougl	nt:	As above		
Panel Recomm	endation:	Accept in Part		
Submission Number: Submitter:	70: 52 The Fertiliser	Association of New Zealand	Submission Type: Opp	oose in Part
Submission Summary: It is recommendation		nded to include a reference to	working with the farming c	ommunity.
Decision Sought: Insert new: (f) Work collaboratively with the farming community and industry experts to achieve policies of the Plan and the objectives of the RPS and Regional Water and Land Plan. Or similar.			ustry experts to achieve the	

Further Submission(s)

	Further Submission No: Further Submitter: Submission Summary:		15 - 43 Ballance Agri-Nutri	Submission Type ents Limited	e: Support
			practice. Ballance		resource management planning Inning processes, which seek to involve able outcomes for all.
	Decision Sought	:	As above		
	Panel Recomm	endation:	Accept in Part		
Section	n: LR M5(a)				10
Panel R	ecommendatio	n			
See Section Submis	on on LR M5 above. sions				
Submissi	ion Number:	43: 42		Submission Type:	Support in Part
Submitter	r:	Ravensdow	n Limited		
Submissi	ion Summary:	for when the	at plan will be prepare		it is considered timeframes are require Ravensdown also considers it importar plementation plan.
Decision	Sought:	Retain the intent to prepare a Rule Implementation Plan and include a date for completing the review period; In (a), add a footnote to say that the implementation plan will be development in collaboration primary sector representatives (and others, for example, iwi etc.).			
Panel Re	ecommendations:	Reject in pa	art.		
Submissi	ion Number:	49: 58		Submission Type:	Support
Submitter	r:	CNI Iwi Lan	d Management Ltd		
Submissi	ion Summary:	Support.			
Decision	Sought:	Retain.			
Panel Re	ecommendations:	Accept			
Further	Submission(s)				
	Further Submiss	ion No:	14 - 29	Submission Typ	be: Support
	Further Submitte	er:	Hancock Forest Ma	anagement (NZ) Ltd	
	Submission Sun	nmary:	Support.		
Decision Sought:		As above			
	Panel Recomme	endation:	Accept		
Submissi	ion Number:	53: 41		Submission Type:	Support in Part
Submitter: Lachlan McK		Kenzie			
Submission Summary: Amend to be		e consistent with recor	mmended alternate Integrated N	lutrient Management Framework.	
Decision Sought: Amend to read '(a) support the establishment and resourcing of sub-catchment committees sub-catchment Action Plans for the reduction of nutrient loads to the lake.'					
Panel Recommendations: Accept in Part					

Submission Number:	56: 4	Submission Type:	Support
Submitter:	Bay of Plenty Regional Council		
Submission Summary:	There is no direction on the intent and intent that the implementation will be made available.		f the rule implementation plan. Clarify
Decision Sought:	Expand Method 5(a). It is suggested that maintain a Rule Implementation Plan to e implementation of Plan Change 10 by Co	nsure accurate and cons	

Panel Recommendations: Accept

Further Submission No: 8 - 45 Submission Type: Oppose Further Submitter: Lake Rotorua Primary Producers Collective Submission Summary: PC 10 rules must be clear on expectation so as not to have an inconsistent interpretation of them. A further implementation plan to clarify should not be necessary Decision Sought: As above Panel Recommendation: Reject Further Submission No: 12 - 52 Submission Type: Oppose Further Submitter: Federated Farmers of New Zealand Oppose Panel Recommendation: Reject Submission Summary: Oppose the development of a Rule Implementation Plan. PC10 should be expressed with sufficient clarity to allow accurate and consistent interpretation without requiring further reference to another document. Decision Sought: As above Panel Recommendation: Reject Submission Type: Support in Part Submission Number: 66: 79 Submission Type: Support in Part Submission Summary: Improve clarity and completeness. Support in Part Decision Sought: Amend to '(a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake. Panel Recommendations: 75: 169 Submission Type:	Further Submission(s)					
Submission Summary: PC 10 rules must be clear on expectation so as not to have an inconsistent interpretation of them. A further implementation plan to clarify should not be necessary Decision Sought: As above Panel Recommendation: Reject Further Submission No: 12 - 52 Submission Type: Oppose Further Submission No: 12 - 52 Submission Type: Oppose Further Submitter: Federated Farmers of New Zealand Submission Summary: Oppose the development of a Rule Implementation Plan. PC10 should be expressed win sufficient clarity to allow accurate and consistent interpretation without requiring further reference to another document. Decision Sought: As above Panel Recommendation: Reject Submission Number: 66: 79 Submission Type: Support in Part Submission Summary: Improve clarity and completeness. Decision Sought: Amend to '(a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.' Panel Recommendations: Accept in Part Submission Number: 75: 169 Submission Type: Support in Part Submission Summary: Amend to be consistent with recommended alternate Integrated Nutrient Management Framework. Deci	Further Submiss			Submission Type: Oppose		
of them. A further implementation plan to clarify should not be necessary Decision Sought: As above Panel Recommendation: Reject Further Submission No: 12 - 52 Submission Type: Oppose Further Submitter: Federated Farmers of New Zealand Oppose the development of a Rule Implementation Plan. PC10 should be expressed will sufficient clarify to allow accurate and consistent interpretation without requiring further reference to another document. Decision Sought: As above Panel Recommendation: Reject Submission Type: Support in Pan. PC10 should be expressed will sufficient clarify to allow accurate and consistent interpretation without requiring further reference to another document. Decision Sought: As above Panel Recommendation: Reject Submission Type: Support in Part Submission Number: 66: 79 Submission Type: Support in Part Submission Summary: Improve clarity and completeness. Support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake. Panel Recommendations: Accept in Part Submission Number: 75: 169 Submission Type: Support in Part Submission Number: 75: 169 Submission Type: Support in Part	Further Submitte			ary Producers Collective		
Panel Recommendation: Reject Further Submission No: 12 - 52 Submission Type: Oppose Further Submission No: 12 - 52 Submission Type: Oppose Further Submitter: Federated Farmers of New Zealand Submission Summary: Oppose the development of a Rule Implementation Plan. PC10 should be expressed with sufficient clarity to allow accurate and consistent interpretation without requiring further reference to another document. Decision Sought: As above Panel Recommendation: Reject Submission Number: 66: 79 Submission Type: Support in Part Submission Summary: Improve clarity and completeness. Decision Sought: Amend to '(a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.' Panel Recommendations: Accept in Part Submission Number: 75: 169 Submission Type: Support in Part Submission Summary: Amend to be consistent with recommended alternate Integrated Nutrient Management Framework. Decision Sought: Amend to be consistent with recommended alternate Integrated Nutrient Management Framework. Cation Plans for the reduction of nutrient loads to the lake. Action Plans for the reduction of nutrient loads to the lake.	Submission Sum	imary:				
Further Submission No: 12 - 52 Submission Type: Oppose Further Submitter: Federated Farmers of New Zealand Submission Summary: Oppose the development of a Rule Implementation Plan. PC10 should be expressed will sufficient clarity to allow accurate and consistent interpretation without requiring further reference to another document. Decision Sought: As above Panel Recommendation: Reject Submission Number: 66: 79 Submission Summary: Improve clarity and completeness. Decision Sought: Amend to '(a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.' Panel Recommendations: Accept in Part Submission Number: 75: 169 Submission Type: Support in Part Submission Number: 75: 169 Submission Type: Support in Part Submission Summary: Amend to be consistent with recommended alternate Integrated Nutrient Management Framework. Decision Sought: Amend as follows (a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake. 	Decision Sought	:	As above			
Further Submitter: Federated Farmers of New Zealand Submission Summary: Oppose the development of a Rule Implementation Plan. PC10 should be expressed will sufficient clarity to allow accurate and consistent interpretation without requiring further reference to another document. Decision Sought: As above Panel Recommendation: Reject Submission Number: 66: 79 Submission Summary: Improve clarity and completeness. Decision Sought: Amend to '(a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.' Panel Recommendations: Accept in Part Submission Number: 75: 169 Submission Type: Support in Part Submission Summary: Federated Farmers of New Zealand Submission Type: Support in Part Submission Number: 75: 169 Submission Type: Support in Part Submission Summary: Amend to be consistent with recommended alternate Integrated Nutrient Management Framework. Decision Sought: Amend to be consistent with recommended alternate Integrated Nutrient Management Framework. Decision Sought: Amend to be consistent and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.	Panel Recomme	endation:	Reject			
Submission Summary: Oppose the development of a Rule Implementation Plan. PC10 should be expressed with sufficient clarity to allow accurate and consistent interpretation without requiring further reference to another document. Decision Sought: As above Panel Recommendation: Reject Submission Number: 66: 79 Submission Summary: Lake Rotorua Primary Producers Collective Submission Summary: Improve clarity and completeness. Decision Sought: Amend to '(a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.' Panel Recommendations: Accept in Part Submission Number: 75: 169 Submission Summary: Federated Farmers of New Zealand Submission Summary: Amend to be consistent with recommended alternate Integrated Nutrient Management Framework. Decision Sought: Amend as follows (a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.' 	Further Submiss	ion No:	12 - 52	Submission Type: Oppose		
Subficient clarity to allow accurate and consistent interpretation without requiring further reference to another document. Decision Sought: As above Panel Recommendation: Reject Submission Number: 66: 79 Submission Type: Support in Part Submission Summary: Improve clarity and completeness. Submission Submission Summary: Improve clarity and completeness. Decision Sought: Amend to '(a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.' Panel Recommendations: Accept in Part Submission Number: 75: 169 Submission Type: Support in Part Submission Summary: Arend to be consistent with recommended alternate Integrated Nutrient Management Framework. Decision Sought: Arend as follows (a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.	Further Submitte	r:	Federated Farmers	s of New Zealand		
Panel Recommendation: Reject Submission Number: 66: 79 Submission Type: Support in Part Submission Summary: Lake Rotorua Primary Producers Collective Submission Summary: Improve clarity and completeness. Decision Sought: Amend to '(a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.' Panel Recommendations: Accept in Part Submission Number: 75: 169 Submission Type: Support in Part Submission Summary: Federated Farmers of New Zealand Submission Type: Support in Part Submission Summary: Amend to be consistent with recommended alternate Integrated Nutrient Management Framework. Decision Sought: Amend as follows (a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.	Submission Sum	imary:	sufficient clarity to	allow accurate and consistent interpretation without requiring further		
Submission Number: 66: 79 Submission Type: Support in Part Submission Summary: Lake Rotorua Primary Producers Collective Submission Summary: Improve clarity and completeness. Decision Sought: Amend to '(a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.' Panel Recommendations: Accept in Part Submission Number: 75: 169 Submission Type: Support in Part Submission Summary: Federated Farmers of New Zealand Submission Summary: Amend to be consistent with recommended alternate Integrated Nutrient Management Framework. Decision Sought: Amend as follows (a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.	Decision Sought	:	As above			
Submitter: Lake Rotorua Primary Producers Collective Submission Summary: Improve clarity and completeness. Decision Sought: Amend to '(a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.' Panel Recommendations: Accept in Part Submission Number: 75: 169 Submission Type: Support in Part Submission Summary: Federated Farmers of New Zealand Submission Summary: Amend to be consistent with recommended alternate Integrated Nutrient Management Framework. Decision Sought: Amend as follows (a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake. 	Panel Recomme	endation:	Reject			
Submission Summary: Improve clarity and completeness. Decision Sought: Amend to '(a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.' Panel Recommendations: Accept in Part Submission Number: 75: 169 Submission Type: Support in Part Submission Summary: Federated Farmers of New Zealand Submission Summary: Amend to be consistent with recommended alternate Integrated Nutrient Management Framework. Decision Sought: Amend as follows (a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake. 	Submission Number:	66: 79		Submission Type: Support in Part		
Decision Sought: Amend to '(a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.' Panel Recommendations: Accept in Part Submission Number: 75: 169 Submission Type: Support in Part Submission Summary: Federated Farmers of New Zealand Submission Summary: Amend to be consistent with recommended alternate Integrated Nutrient Management Framework. Decision Sought: Amend as follows (a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake. 	Submitter:	Lake Rotorua	a Primary Producers	Collective		
catchment Action Plans for the reduction of nutrient loads to the lake.' Panel Recommendations: Accept in Part Submission Number: 75: 169 Submission Type: Submission Summary: Federated Farmers of New Zealand Submission Summary: Amend to be consistent with recommended alternate Integrated Nutrient Management Framework. Decision Sought: Amend as follows (a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake. 	Submission Summary:	Improve clari	ty and completeness			
Submission Number: 75: 169 Submission Type: Support in Part Submission Number: Federated Farmers of New Zealand Federated Farmers of New Zealand Submission Summary: Amend to be consistent with recommended alternate Integrated Nutrient Management Framework. Decision Sought: Amend as follows (a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.	Decision Sought:					
Submitter: Federated Farmers of New Zealand Submission Summary: Amend to be consistent with recommended alternate Integrated Nutrient Management Framework. Decision Sought: Amend as follows (a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake. 	Panel Recommendations:	Accept in Pa	rt			
Submission Summary: Amend to be consistent with recommended alternate Integrated Nutrient Management Framework. Decision Sought: Amend as follows (a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake. 	Submission Number:	75: 169		Submission Type: Support in Part		
Decision Sought: Amend as follows (a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.	Submitter:	mitter: Federated F		nd		
(a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment Action Plans for the reduction of nutrient loads to the lake.	Submission Summary:	nission Summary: Amend to be		e consistent with recommended alternate Integrated Nutrient Management Framework.		
Panel Recommendations: Reject	Decision Sought:	(a) support the establishment and resourcing of sub-catchment committees to develop sub-catchment				
	Panel Recommendations:	Reject				

Section: LR M5(b)

Panel Recommendation See Section on LR M5 above.

Submissions

Submission Number:

Submission Type:

Support

	_	
Submission Summary:	Support.	
Decision Sought:	Retain.	
Panel Recommendations:	Accept	
Further Submission(s)		
Further Submiss	ion No:	14 - 30 Submission Type: Support
Further Submitte	er:	Hancock Forest Management (NZ) Ltd
Submission Sum	nmary:	Support.
Decision Sought	:	Not specified
Panel Recomme	endation:	Accept
Submission Number:	53: 42	Submission Type: Support in Part
Submitter:	Lachlan McKe	enzie
Submission Summary:	Amend to be	consistent with recommended alternate Integrated Nutrient Management Framework.
Decision Sought:		d: '(b) report on the achievement of the sub-catchment Action Plans on a five-yearly basis effectiveness reporting.'
Panel Recommendations:	Reject	
Submission Number:	66: 80	Submission Type: Support in Part
Submitter:	Lake Rotorua	Primary Producers Collective
Submission Summary:	Improve clarit	y and completeness.
Decision Sought:		report on the achievement of the sub-catchment Action Plans on a five-yearly basis through ness reporting.'
Panel Recommendations:	Reject	
Submission Number:	75: 170	Submission Type: Support in Part
Submitter:	Federated Fa	rmers of New Zealand
Submission Summary:	Amend to be	consistent with recommended alternate Integrated Nutrient Management Framework.
Decision Sought:		ows: (b) report on the achievement of the sub-catchment Action Plans on a five-yearly basis effectiveness reporting;
Panel Recommendations:	Reject	
Section: LR M5(c)		1207

Panel Recommendation

See Section on LR M5 above.

Submissions

Submission Number:	43: 43	Submission Type:	Support in Part
Submitter:	Ravensdown Limited		
Submission Summary:	In relation to the development and mainted be privacy issues regarding holding such the purpose of the register and who can a also be a useful tool for Council.	a register, and protocols	may be required to determine confirm
Decision Sought:	Develop a set of protocols for the develop is clear and access is limited to retain pri		of a NDA register to ensure its purpose

Consider developing a Benchmark Register with similar protocols.

Danal Daaammar					
Panel Recommer	ndations: Rej	ect			
Submission Num	ber: 49:	60		Submission Type:	Support in Part
Submitter:	CN	I Iwi Land M	lanagement Ltd		
Submission Sumr	it is bet	subject to t ter to have a	he vagaries of the ch a register of the input	anges that various versions o	out from OVERSEER® . Which means of OVERSEER® introduces. It would be can be fed through any version of any way that model outputs are.
Decision Sought:		word as: 'De chment wide		landuse input data register t	hat will allow for monitoring of
Panel Recommer	ndations: Rej	ect			
Further Submis	ssion(s)				
Further	r Submission N	lo:	8 - 56	Submission Ty	pe: Oppose
Further	r Submitter:		Lake Rotorua Primar	y Producers Collective	
Submis	ssion Summary		To allow for ongoing allow pastoral industr of the economy and t	adaptive management it mus ies to make use of developin	a land use input data register. It be 'outputs' that are monitored. To ig technologies and science for the good to a allowed to adapt and farm to the ponthly basis.
Decisio	on Sought:		As above		
Panel	Recommendat	ion:	Reject		
F	Further Submis	sion No:	12 – 17	Submis	ssion Type: Support in Part
Further Submitter					
ł	Further Submit	ter:	Federated Farmers of	f New Zealand	
	Further Submit Submission Su	immary:	Support the recomme precision and accura	endation that policy and meth	es. Oppose the recommendation to
S		immary:	Support the recomme precision and accura	endation that policy and meth cy of OVERSEER® estimate	
S	Submission Su	ımmary: ht:	Support the recommo precision and accura develop and maintair As above	endation that policy and meth cy of OVERSEER® estimate	es. Oppose the recommendation to
: [Submission Su Decision Soug	Immary: ht: nmendation:	Support the recommo precision and accura develop and maintair As above Reject	endation that policy and meth cy of OVERSEER® estimate a land use input data regist	es. Oppose the recommendation to
5 [F	Submission Su Decision Soug Panel Recom	Immary: ht: nmendation: ssion No:	Support the recommo precision and accura develop and maintair As above Reject	endation that policy and meth cy of OVERSEER® estimate a land use input data regist	es. Oppose the recommendation to ter.
5 [Submission Su Decision Soug Panel Recom Further Submis	Immary: ht: nmendation: ssion No: iter:	Support the recommon precision and accura develop and maintair As above Reject 14 – 31 Hancock Forest Man	endation that policy and meth cy of OVERSEER® estimate a land use input data regist	es. Oppose the recommendation to ter.
5 [[F F S	Submission Su Decision Soug Panel Recom Further Submis Further Submit	Immary: ht: nmendation: ssion No: tter: Immary:	Support the recommon precision and accura develop and maintair As above Reject 14 – 31 Hancock Forest Man	endation that policy and meth cy of OVERSEER® estimate a land use input data regist Submis agement (NZ) Ltd	es. Oppose the recommendation to ter.
5 [[F F S	Submission Su Decision Soug Panel Recorr Further Submis Further Submit Submission Su	Immary: ht: nmendation: ssion No: tter: Immary: ht:	Support the recommon precision and accura develop and maintain As above Reject 14 – 31 Hancock Forest Man For the reasons given As above	endation that policy and meth cy of OVERSEER® estimate a land use input data regist Submis agement (NZ) Ltd	es. Oppose the recommendation to ter.
5 [[F 5 5 1 [Submission Su Decision Soug Panel Recorr Further Submis Further Submit Submission Su Decision Soug Panel Recorr	Immary: ht: mendation: ssion No: tter: Immary: ht: mendation:	Support the recommon precision and accura develop and maintain As above Reject 14 – 31 Hancock Forest Man For the reasons given As above	endation that policy and meth cy of OVERSEER® estimate a land use input data regist Submis agement (NZ) Ltd n in the original submission.	es. Oppose the recommendation to ter.
s [[F Submission Numb	Submission Su Decision Soug Panel Recorr Further Submis Further Submit Submission Su Decision Soug Panel Recorr ber: 53:	Immary: ht: mendation: ssion No: tter: Immary: ht: mendation: 43	Support the recommon precision and accura develop and maintain As above Reject 14 – 31 Hancock Forest Man For the reasons given As above Reject	endation that policy and meth cy of OVERSEER® estimate a land use input data regist Submis agement (NZ) Ltd n in the original submission.	es. Oppose the recommendation to ter.
s I I I I Submission Numb Submitter:	Submission Su Decision Soug Panel Recom Further Submit Submission Su Decision Soug Panel Recom ber: 53: Lac	Immary: ht: mendation: ssion No: iter: Immary: ht: mendation: 43 chlan McKer	Support the recommon precision and accura develop and maintain As above Reject 14 – 31 Hancock Forest Man For the reasons given As above Reject	endation that policy and meth cy of OVERSEER® estimate a land use input data regist Submis agement (NZ) Ltd n in the original submission.	es. Oppose the recommendation to ter. ssion Type: Support e: Support in Part
s Submission Numb Submitter: Submission Sumr	Submission Su Decision Soug Panel Recorr Further Submit Submission Su Decision Soug Panel Recorr ber: 53: Lac mary: Am	Immary: ht: mendation: ssion No: tter: Immary: ht: mendation: 43 thlan McKer end to be co	Support the recommon precision and accura develop and maintain As above Reject 14 – 31 Hancock Forest Man For the reasons given As above Reject	endation that policy and meth cy of OVERSEER® estimate a land use input data regist Submis agement (NZ) Ltd n in the original submission. Submission Type	es. Oppose the recommendation to ter. ssion Type: Support e: Support in Part Nutrient Management Framework.
Submission Numb Submission Sumr Decision Sought:	Submission Su Decision Soug Panel Recorr Further Submit Submission Su Decision Soug Panel Recorr ber: 53: Lac mary: Am	Immary: ht: mendation: ssion No: tter: Immary: ht: mendation: 43 shlan McKer end to be co end to read:	Support the recommon precision and accura develop and maintain As above Reject 14 – 31 Hancock Forest Man For the reasons given As above Reject	endation that policy and meth cy of OVERSEER® estimate a land use input data regist Submis agement (NZ) Ltd n in the original submission. Submission Type	es. Oppose the recommendation to ter. ssion Type: Support e: Support in Part
s Submission Numb Submitter: Submission Sumr	Submission Su Decision Soug Panel Recorr Further Submit Submission Su Decision Soug Panel Recorr ber: 53: Lac mary: Am	Immary: ht: mendation: ssion No: tter: Immary: ht: mendation: 43 thlan McKer end to be co	Support the recommon precision and accura develop and maintain As above Reject 14 – 31 Hancock Forest Man For the reasons given As above Reject	endation that policy and meth cy of OVERSEER® estimate a land use input data regist Submis agement (NZ) Ltd n in the original submission. Submission Type	es. Oppose the recommendation to ter. ssion Type: Support e: Support in Part Nutrient Management Framework.
Submission Numb Submission Sumr Decision Sought:	Submission Su Decision Soug Panel Recorr Further Submis Further Submit Submission Su Decision Soug Panel Recorr ber: 53: Lac mary: Am Am	Immary: ht: mendation: ssion No: tter: Immary: ht: mendation: 43 shlan McKer end to be co end to read: ect	Support the recommon precision and accura develop and maintain As above Reject 14 – 31 Hancock Forest Man For the reasons given As above Reject	endation that policy and meth cy of OVERSEER® estimate a land use input data regist Submis agement (NZ) Ltd n in the original submission. Submission Type nended alternate Integrated N	es. Oppose the recommendation to ter. ssion Type: Support e: Support in Part Nutrient Management Framework.
Submission Numb Submission Numb Submission Sumr Decision Sought: Panel Recommer	Submission Su Decision Soug Panel Recom Further Submit Submission Su Decision Soug Panel Recom ber: 53: Lac mary: Am Am ndations: Rej ber: 66:	Immary: ht: mendation: ssion No: iter: Immary: ht: mendation: 43 shlan McKer end to be co end to read: ect 81	Support the recommon precision and accura develop and maintain As above Reject 14 – 31 Hancock Forest Man For the reasons given As above Reject	endation that policy and meth cy of OVERSEER® estimate a land use input data regist Submis agement (NZ) Ltd n in the original submission. Submission Type nended alternate Integrated N ent-wide progress towards me Submission Type	es. Oppose the recommendation to ter. ssion Type: Support e: Support in Part Nutrient Management Framework. eeting the RWLP TLI objective.'

Decision Sought:	Amend to: (c) monitor catchment-wide progress towards meeting the RPS Policy WL 3B(c) catchment nitrogen load; and the "nominal' phosphorous load.				
Panel Recommendations:	Reject				
Submission Number:	75: 171	Submission Type:	Support in Part		
Submitter:	Federated Farmers of New Zealand				
Submission Summary:	Amend to be consistent with recommend	ed alternate Integrated N	Nutrient Management Framework.		
Decision Sought:	Amend as follows (c) monitor catchment-wide progress towards meeting the RWLP TLI objective.				
Panel Recommendations:	Reject				

Section: LR M5(d)

Panel Recommendation

See Section on LR M5 above.

Panel Reason

Submissions

Submission Number:	43: 44	Submission Type:	Support in Part		
Submitter:	Ravensdown Limited				
Submission Summary:	In relation to (d), land use change is not necessarily required to reduce nitrogen and phosphorus loss in the catchment, and Ravensdown considers that council services and incentives should be focused supporting and directing farming. properties to implement good management practices.				
Decision Sought:	In (d), delete 'change and land use change	e' and add 'practices'.			
Panel Recommendations:	Accept in Part				
Submission Number:	49: 61	Submission Type:	Support		
Submitter:	CNI lwi Land Management Ltd				
Submission Summary:	Support.				
Decision Sought:	Retain.				
Panel Recommendations:	Accept				

Further Submission(s)

		-/				
Further Submis		ssion No:	14 - 32	Submission Type	e: Support	
	Further Submitter: Submission Summary: Decision Sought:		Hancock Forest Management (NZ) Ltd			
			Support. As above			
	Panel Recomm	nendation:	Accept			
Submiss	ion Number:	70: 51		Submission Type:	Oppose in Part	
Submitte	Submitter: The Fertilise		er Association of New 2	Zealand		
,		ieved by changes in lar	, , , , , , , , , , , , , , , , , , , ,	nd Phosphorus loss in the catchment. It en to encouraging industry agreed good		

Decision Sought: Amend LR M5 as follows:

... (d) provide land advisory services and incentives to support land use and land use management that reduces nitrogen and phosphorus loss in the catchment; and...

Panel Recommendations	I	ait		
Further Submis		15 - 42 Submission Type: Support		
Further Submit		Ballance Agri-Nutrients Limited		
Submission Su	ummary:	For the reasons given in the original submission.		
Decision Soug	ht:	As above		
Panel Recomm	mendation:	Accept in Part		
Section: LR M5(e))			
Panel Recommendation				
Submissions				
Submission Number:	43: 45	Submission Type: Support in Part		
Submitter:	Ravensdow	vn Limited		
Submission Summary:	Ravensdow	(e), while Ravensdown supports the intent, it considers this matter should be a policy. Thas requested Policy LR P2 be amended to include good management practices and can be deleted.		
Decision Sought:	Delete (c) c	on the basis it would be included in Policy LRP2.		
Panel Recommendations	: Reject			
Further Submission(s)			
Further Submis	ssion No:	15 - 6 Submission Type: Support		
Further Submit	tter:	Ballance Agri-Nutrients Limited		
Submission Su	ummary:	Good management practices combine the practical experience of land users with scientid development, provide recommendations that can be adapted to suit local conditions, allow for changes to be made to the way some nutrient management activities are carried out, and provide the means for continuous (and innovative) improvement in nutrient management on a property. Good management practices to nutrient management are widely utilised and inclusion of GMP in PC10 is consistent with the approach being adopted in a number of areas around New Zealand.		
Decision Soug	ht:	As above		
Panel Recomm	mendation:	Accept in Part		
Submission Number:	49: 62	Submission Type: Support		
Submitter:	CNI Iwi Lan	nd Management Ltd		
Submission Summary: Support.				
Decision Sought:	Retain.			
Panel Recommendations	: Accept			
Further Submission(s)			
Further Submis	ssion No:	14 – 33 Submission Type: Support		
Further Submit	tter:	Hancock Forest Management (NZ) Ltd		
<u> </u>				

Support.

Submission Summary:

Chapter: Part 3 LR: Lake Rotorua Nutrient Management

Section: Rules

Panel Recommendation

We concur with the Regional Council reporting officers' recommendations as contained in their s42A report and additional evidence presented during the hearing.

Submissions

Submission Number:	43: 46	Submission Type:	Oppose	
Submitter:	Ravensdown Limited			
Submission Summary:	Ravensdown opposes the intention of the rules to control the input of nitrogen onto land. It opposes the intent to manage nitrogen inputs. 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.			
Decision Sought:	Amend the first sentence to read: "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 from land where it could enter Lake Rotorua."			
Panel Recommendations:	Accept			

Further	Submission(s)				
	Further Submission No:	15 - 1	Submission Type:	Support	
	Further Submitter:	Ballance Agri-Nutrients Limited			
	Submission Summary:	Ballance Agri-Nutrients Limited Ballance supports an output-based approach to nutrient management. There can be significant investment required to implement an input based approach, which restricts flexibility and can stifle farming practice innovation, without necessarily achieving the environmental outcomes sought. An input based approach regulates how farmers may farm. Output based approaches focus on the environmental bottom lines and thus enable flexibility and individualised responses. Ballance agrees that nitrogen inputs can be managed through implementing good management practice and this has been adopted in a number of areas throughout New Zealand.			
	Decision Sought:	As above			
	Panel Recommendation:	Accept in Part			

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Submission Number:	43: 47 Submission Type: Oppose
Submitter:	Ravensdown Limited
Submission Summary:	It is not appropriate for the definition of property/farming enterprise to be included at the beginning of the rules.
Decision Sought:	Delete the definition of property/farming enterprise from the introduction as it already included in the definitions.
Panel Recommendations:	Accept
Submission Number:	70: 53 Submission Type: Support in Part
Submitter:	The Fertiliser Association of New Zealand
Submission Summary:	FANZ support output based management, which address the losses from land as it is the loss which gives rise to the adverse environmental effects.
Decision Sought:	Amend paragraph 1 in Part III Rules 'nitrogen loss from land where it could enter Lake Rotorua'.
Panel Recommendations:	Accept
Further Submission(s)	
Further Submissi	on No: 15 - 44 Submission Type: Support
Further Submitte	r: Ballance Agri-Nutrients Limited
Submission Sum	mary: Ballance supports an output-based approach to nutrient management.
Decision Sought:	As above
Panel Recomme	ndation: Accept
Submission Number:	75: 176 Submission Type: Oppose
Submitter:	Federated Farmers of New Zealand
Submission Summary:	Definitions should be located in the definitions section.
Decision Sought:	Delete definition of Property/farming enterprise.
5	

Panel Recommendation

We concur with the Regional Council reporting officers' recommendations as contained in their s42A report and additional evidence presented during the hearing.

Submissions

Submission Number:	43: 48	Submission Type:	Oppose in Part
Submitter:	Ravensdown Limited		
Submission Summary:	There needs to be a clear statement that i provisions of the operative Regional Plan		1

	proposed PC 10 address the same activity.				
Decision Sought:	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.				
Panel Recommendations:	Accept in Part				
Submission Number:	70: 54	Submission Type: S	upport in Part		
Submitter:	The Fertiliser Association of New Zeala	nd			
Submission Summary:	Conflict could arise if the operative Regional Water and Land Plan that manage land, water, discharges and land use activities still apply. It is suggested that Council provide guidance on how to manage this conflict.				
Decision Sought:	Clarify Note 4 as to how conflict might b Regional Water and Land Plan that mar	5			
Panel Recommendations:	Accept in Part				
Further Submission(s)					
Further Submiss	sion No: 15 - 45	Submission Type:	Support		

	Further Submitter:	Ballance Agri-Nutrients Limited
	Submission Summary:	The advice note needs to be expanded to clarify which provisions take precedence with respect to the RWLP and activities managed under Part II LR and Part III LR.
	Decision Sought:	As above
	Panel Recommendation:	Accept in Part
• •		1061

Section: Advice Note 5

Panel Recommendation

We concur with the Regional Council reporting officers' recommendations as contained in their s42A report and additional evidence presented during the hearing.

Submissions

Submission Number:	43: 49	Submission Type:	Oppose		
Submitter:	Ravensdown Limited				
Submission Summary:	The advice note serves no purpose and is	not necessary.			
Decision Sought:	Delete the General Advice Notes for rules: No. 5.				
Panel Recommendations:	Accept				
Submission Number:	70: 55	Submission Type:	Oppose		
Submitter:	The Fertiliser Association of New Zealand	21			
Submission Summary:	The advice note is confusing and unnecessary. The advice note does not clarify where ultimate responsibility lies and serves no useful purpose.				
Decision Sought:	Delete advice note.				
Panel Recommendations:	Accept				

Section: Rule Summary flowchart

Panel Recommendation

We concur with the Regional Council reporting officers' recommendations as contained in their s42A report and additional evidence presented during the hearing.

Submissions

Submission Number:	43: 50	Submission Type:	Oppose
Submitter:	Ravensdown Limited		
Submission Summary:	The flowchart is unhelpful and serves no p	urpose. It has been co	ndensed and is incomplete.
Decision Sought:	Delete the rule summary chart.		
Panel Recommendations:	Accept		
Submission Number:	56: 5	Submission Type:	Support
Submitter:	Bay of Plenty Regional Council		
Submission Summary:	Add text to ensure that there is ensure there is consistency between the rules and the Rule summary flowchart.		
Decision Sought:	Add "commercial" in front of dairy farming in box 'under properties 5 hectares in area or less' in the rule summary flowchart.		
Panel Recommendations:	Reject		
Submission Number:	70: 56	Submission Type: Oppose in Part	
Submitter:	The Fertiliser Association of New Zealand		
Submission Summary:	The flow chart is incomplete and therefore confusing. It does not provide for all activity types.		
Decision Sought:	Amend to clarify pathways, missing provisions and activity status where conditions are not met for properties not previously managed by Rule 11 and low intensity properties of any size.		
Panel Recommendations:	Reject		

Section: Land use rules

Panel Recommendation

Refer to the body of our report for our recommendation on this section.

Submission Number:	13: 5		Submission Type:	Oppose
Submitter:	Alister Sno	dgrass		
Submission Summary:			kity and ongoing cost around re- to uneconomic small farms.	source consent, farm plans, and
Decision Sought:	Not specifie	ed		
Panel Recommendations:	Reject			
Submission Number:	15: 3		Submission Type:	Oppose
Submitter:	Murray and	Robyn Pearce		
Submission Summary:			osphate leaching however do r bhate from processes like harve	not put in place land management esting plantation forests.
Decision Sought:	Not specifie	ed.		
Panel Recommendations:	Reject			
Further Submission(s)				
Further Submiss	ion No:	17 - 2	Submission Ty	pe: Support
Further Submitte	er:	Murray and Robyn	Pearce	
Submission Sur	nmary:	For the reasons give	ven in the original submission.	
Decision Sough	::	As above		
Panel Recomm	endation:	Reject		
Submission Number:	15: 5		Submission Type:	Oppose
Submitter:	Murray and	Robyn Pearce		
Submission Summary:			ntense leaching. The issue of w the proposed rule changes.	vater sourcing from wells in these
Decision Sought: We propose that ground water monitoring from wells and seeps from different depths be mon areas to be monitored are those downstream from known high leaching activities.				
Panel Recommendations	: Reject			

	17 - 4	Submission Type:	Support
Further Submitter:	Murray and Robyn Pearce		
Submission Summary:	For the reasons given in th	e original submission.	
Decision Sought:	As above		
Panel Recommendation:	Reject		

Submitter:

Murray and Robyn Pearce

	and	Further Submissions – Part 2		
Submission Summary:	to subsidise. business mus	not consider the nature of the business of land users they are protecting and forcing others Plantation Forestry and Dairy are commodity industries when process are high these st increase production to take advantage for the higher prices. Unless the fines are h or enforcement effective these producers will increase production and environmental		
Decision Sought:		that the rules include a statement mechanism that will stop commodity producers increasing at increases pollution.		
Panel Recommendations:	Reject			
Further Submission(s)				
Further Submiss	ion No:	17 - 5 Submission Type: Support		
Further Submitte	er:	Murray and Robyn Pearce		
Submission Sum	nmary:	For the reasons given in the original submission.		
Decision Sought	:	As above		
Panel Recomme	endation:	Reject		
Submission Number:	16: 2	Submission Type: Support in Part		
Submitter:	Neil Heather			
Submission Summary:		les framework for capping nutrient discharges and that these rules should include properties y included in Rule 11. This includes under 5 hectares.		
Decision Sought:	Not specified			
Panel Recommendations:	Accept in Pa	rt		
Submission Number:	17: 9	Submission Type: Oppose in Part		
Submitter:	D & A Trust			
Submission Summary: Decision Sought:	did not apply disadvantage It is our conte cannot get to there is no po The threshold Council when	ently small blocks were not part of the process and prior to Rule 11 actively advised that this to them. Only recently have they become part of the process and are thus severely din knowledge and input. ention that this it impossible to enforce compliance on small blocks as the systems available the level of detail. If compliance with a rule cannot be measures, it cannot be enforced and bint in having the rule. d for small blocks should be lifted to 40 hectares to align with the information provided by they were introducing Rule 11. Council have the ability to take up any additional N load that eshold to 40ha would create through its community initiatives and incentives.		
Panel Recommendations:	Reject			
Further Submission(s)				
Further Submiss	ion No:	7 - 6 Submission Type: Oppose		
Further Submitte	er:	Alistair and Sarah Coatsworth		
Submission Sum	nmary:	All land has the ability to contribute nutrients to the environment.		
Decision Sought		As above		
Panel Recomme	endation:	Reject		
L				

Submission Number:	17: 12 Submission Type: Oppose		
Submitter:	D & A Trust		
Submission Summary:	The rules as set out in PC 10 will require considerable growth in staff and support. All of which comes a cost to ratepayers. Councils ability to ensure compliance using OVERSEER® is severely questionable as is the ability to monitor what is occurring in the landscape.		
Decision Sought:	Not specified.		
Panel Recommendations:	The Panel does not consider this to be a submission npoint.		
Submission Number:	19: 1 Submission Type: Oppose		
Submitter:	Dixon Reeves		
Submission Summary:	Farming should not be an activity which is Controlled and should not require Resource consent if the NDA has not been exceeded.		
Decision Sought:	I strongly believe farming should not be an activity which is Controlled and should not require Resource consent if the NDA has not been exceeded.		
Panel Recommendations:	Reject		
Submission Number:	27: 9 Submission Type: Oppose		
Submitter:	Gro2 Ltd		
Submission Summary:	For rules to work they need to be accurate, enforceable and accepted by the public. These rules will kneecap farming in the catchment, property valuations will drop 50%. The flow on will be into town where the service industries suffer, and rate rise as farms have lower values therefore lower rates.		
Decision Sought:	Work with farmers to make improvements we can do now, detention dams arrest nutrient, prevent erosion, eliminate flooding and stop soil reaching the lake.		
Panel Recommendations:	Accept in Part		
Further Submission(s)			

	Further Submission No: Further Submitter:		Submission Type:	Support	
Submission Sum	Submission Summary:		For the reasons given in the original submission.		
Decision Sought	Decision Sought:				
Panel Recomme	endation:	Accept in Part			
Further Submissi	ion No:	8 - 20	Submission Type	e: Support	
Further Submitte	Further Submitter:		Lake Rotorua Primary Producers Collective		
Submission Sum	Submission Summary:		For the reasons given in the original submission.		
Decision Sought	Decision Sought:				
Panel Recomme	endation:	Accept in Part			
Submission Number:	14: 3	Sul	omission Type:	Support in Part	
Submitter:	Warren Webb	ber			
		g land uses has a right of survival s are minor and not considered by			
Decision Sought: Include an ad		lditional rule to deal with exceptior	IS.		
Panel Recommendations: Accept in Par		rt			

Submitte	r:	Warren Webber		
Submiss	ion Summary:	The rules programme anticipates that properties remaining in pastoral agriculture will share 22% of catchment N. Responsibility for the remaining 78% will remain with the wider community		
Decision	Sought:	No changes requested.		
Panel Re	ecommendations:	The Panel considers that this is not a submission point.		
Submissi	ion Number:	27: 11 Submission Type: Oppose		
Submitte		27: 11 Submission Type: Oppose Gro2 Ltd		
	ion Summary:	These rules will destroy farming for the possibility that the lake may improve in 80 years. This is a intergenerational problem that needs an intergenerational solution. What is need is more emphasis on Phosphate and a much less restrictive Nitrogen target.		
Decision	Sought:	Work with farmers to make improvements we can do now, detention dams arrest nutrient, prevent erosion, eliminate flooding and stop soil reaching the lake.		
Panel Re	ecommendations:	Accept in Part		
Further	Submission(s)			
	Further Submiss	sion No: 7 - 20 Submission Type: Support		
	Further Submitte	er: Alistair and Sarah Coatsworth		
	Submission Sum	nmary: For the reasons given in the original submission.		
	Decision Sought	t: As above		
	Panel Recomme	endation: Accept in Part		
	Further Submiss	sion No: 8 - 21 Submission Type: Support		
Further Submitter:		er: Lake Rotorua Primary Producers Collective		
	Submission Sum	nmary: For the reasons given in the original submission.		
	Decision Sought	t: As above		
	Panel Recomme	endation: Accept in Part		
Submissi	ion Number:	28: 2 Submission Type: Oppose		
Submitte	r:	Kevin Davenport		
Submissi	ion Summary:	I do not support having rules for land owners over 40 Hectares, another set of rules for landowners less than 40 Hectares and then no rules for the large group of landowners with 10 Hectares or less.		
would like to see B		I would like to see group discussions or farm workshop sessions on best farming practices held. I would like to see BOP Council working with landowners in smaller groups of the different catchment areas within the Rotorua Basin to help them understand the implications of their Farming practices on their specific area.		
Panel Re	ecommendations:	Reject		
Submissi	ion Number:	30: 2 Submission Type: Support		
Submitte	r:	Fish & Game New Zealand (Eastern Region Fish and Game Council)		
Submissi	ion Summary:	The rules have been set by land use categories to more heavily target sectors that leach greater amounts of nutrient. Major changes to farm management practices may be required but the time frame proposed gives a fair and equitable period to plan for and meet objectives.		
Decision	Sought:	Not specified.		
Panel Re	ecommendations:	Accept		

Submission Number:	32: 15	Submission Type:	Oppose
Submitter:	Kaitao Rotohokahoka 2D Trust		
Submission Summary:	The Trust requests a longer timeframe for Regional Council to invest in better science, research, modelling before setting the allocation methodology, rules, timeframes to meet targets and resource consents in concrete.		
Decision Sought:	Extend the timeframe to set rules, meet nit reductions.	rogen reduction targets	and measure progress towards
Panel Recommendations:	Reject		
Submission Number:	38: 1	Submission Type:	Oppose
Submitter:	Donald Rosslove		
Submission Summary:	I am offended to need a resource consent	to farm my own land.	
Decision Sought:	My recommendation is to limit/ban the use otherwise utilise natural nitrogen/urine pat Research and some commitment into bio-f future of (Lake) Rotorua and need not be a	ches. arming would reflect a	positive commitment to the healthy
Panel Recommendations:	Reject		
Submission Number:	44: 7	Submission Type:	Oppose
Submitter:	Andrea Hammond		
Submission Summary:	Small block owners are being unfairly targeted in this process – the economic and social burden is increased significantly on those with blocks of less than 40 hectares.		
Decision Sought:	The threshold should be lifted to 40 hectares.		
Panel Recommendations:	Reject		
Submission Number:	48: 18	Submission Type:	Oppose
Submitter:	Parekarangi Trust		
Submission Summary:	This is a blunt approach that will cost every farm \$10-20k per annum to administer. 1st July 2017 is too tight a timeframe.		
Decision Sought:	Remove requirement for resource consent for all properties.		
Panel Recommendations:	Reject		
Submission Number:	53: 45	Submission Type:	Oppose
Submitter:	Lachlan McKenzie		
Submission Summary:	The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our integrated nutrient management framework.		
Decision Sought:	Delete and replace with: 'Rule 1 - Permitted Activity The use of land for farming activities/farming enterprises on properties which are less than 5 hectares in area are permitted provided the following condition is met: a) The farming activities/farming enterprises do not comprise of any of the following land use activities: • Commercial cropping; or • Commercial horticulture; or • Dairy farming.'		
Panel Recommendations:	Reject		
Submission Number:	53: 46	Submission Type	e: Oppose
Submitter:	Lachlan McKenzie		
Submission Summary:	The alternate rules recommended give bet integrated nutrient management framewor		WLP objectives and policies; and to our

	and Further Su	bmissions – Part 2	
Decision Sought:	area but less than 10 hectares i a) The stocking rate on the prop point in time; and	in area are permitted provided the perty does not exceed the stocking	erties which are greater than 5 ha in following conditions are met: rates specified in Schedule XX at any ny of the following land use activities:
Panel Recommendations:	Reject		
Submission Number:	53: 47	Submission Type:	Oppose
Submitter:	Lachlan McKenzie		
Submission Summary:	The alternate rules recommended integrated nutrient management		WLP objectives and policies; and to our
Decision Sought:	 hectares in area or do not meet conditions are met: a) The use of land for farming a in area: The farming activities/farming accordance with Schedule AA a b) The use of land for farming a hectares in area: The farming activities/farming property and will not exceed it; of and provide that information to of For the purpose of Rule 3 nutrie 	enterprises will establish and will r and provide that information to Cou activities/farming enterprises on pro- enterprises have a lawfully establis or will establish a nutrient benchma Council by 2017, and will not exce	e permitted provided the following operties which are less than 40 hectares not exceed a nutrient benchmark in uncil by 2017 operties which are greater than 40 shed nutrient benchmark for the ark in accordance with Schedule AA ed it provided with a register of the annual
Panel Recommendations:	Reject		
Submission Number:	53: 48	Submission Type:	Oppose
Submitter:	Lachlan McKenzie		
Submission Summary:	The alternate rules recommended integrated nutrient management		WLP objectives and policies; and to our
Decision Sought:	controlled activity until 2022 pro a) The increase in the export of	vided the following conditions are nitrogen or phosphorous from the	

catchment; and b) The nutrient management measures used to fully offset the effects of the proposed land use do not occur on land which is covered by indigenous forest cover or is on land located within an urban area or lakeside settlement area

Matters of control
a) Measures to offset adverse effects on water quality, including surface water and groundwater.
b) Measures to avoid, remedy or mitigate adverse effects on aquatic ecosystems in streams and rivers.
c) Aspects of the land use activity that cause an increase in the export of nitrogen or phosphorus from the

c) Aspects of the land use activity that cause an increase in the export of nitrogen or phosphorus from the activity.
 d) Measures to fully offset the increase in the export of nitrogen or phosphorus from the activity within the

d) Measures to fully offset the increase in the export of nitrogen or phosphorus from the activity within the same lake catchment.

e) Contractual arrangements with third parties where the offset measures are not applied on the property.

f) Where the offset is not applied on the property, the change to the nutrient benchmark for both properties. The nutrient benchmark for the property where the land use activity will take place will increase, and the property where offset measures will take place will decrease accordingly.
g) Information and monitoring requirements.'

Panel Recommendations: Reject

Cubmission Number	50.40	Cubmission Turner	0
Submission Number: Submitter:	53: 49 Lachlan McKenzie	Submission Type:	Oppose
Submission Summary:	The alternate rules recommended give be integrated nutrient management framewo		WLP objectives and policies; and to our
Decision Sought:	 Delete and replace with: 'Rule 5 – Restricted Discretionary Activity The use of land for farming activities/farmi Restricted Discretionary Activity until 2022 Matters of Discretion a) Measures to offset adverse effects on v b) Measures to avoid, remedy or mitigate a c) Aspects of the land use activity that cau activity. d) Measures to fully offset the increase in same lake catchment. e) Contractual arrangements with third part f) Where the offset is not applied on the pr properties. The nutrient benchmark for the increase, and the property where offset me g) Information and monitoring requirement 	ng enterprises on prope 2. vater quality, including s adverse effects on aqua ise an increase in the ex the export of nitrogen or rties where the offset me roperty, the change to the property where the land easures will take place of	urface water and groundwater. tic ecosystems in streams and rivers. cort of nitrogen or phosphorus from the phosphorus from the activity within the easures are not applied on the property. the nutrient benchmark limit for both d use activity will take place will
Panel Recommendations:	Reject		
Submission Number:	53: 50	Submission Type:	Oppose
Submitter:	Lachlan McKenzie		
Submission Summary:	The alternate rules recommended give be integrated nutrient management framewo		WLP objectives and policies; and to our
Decision Sought:	Delete and replace with: 'Rule 6 – Permitte The use of land for farming activities/farmi hectares in area or which do not meet the the following conditions are met: a) Either The TLI for Lake Rotorua is at or nutrient reduction plans and b) The farming activities/farming enterprise benchmark for the property in accordance	ng enterprises on prope conditions of Rules 1 ar below 4.2; or the sub-c es have and do not exce	nd 2 are permitted from 2022 provided atchment action groups have active eed a lawfully established nutrient
Panel Recommendations:	Reject		
Submission Number:	53: 51	Submission Type:	Oppose
Submitter:	Lachlan McKenzie		
Submission Summary:	The alternate rules recommended give be integrated nutrient management framewo		WLP objectives and policies; and to our
Decision Sought:	 Delete and replace with: 'Rule 7 – Controlled Activity The use of land for farming activities/farmi (b) or (c) of Rules 6 are permitted from 20: a) The TLI for Lake Rotorua is at or below reduction plans and b) The increase in the export of nitrogen of enterprise will be fully offset by the use of catchment; and c) The nutrient management measures us occur on land which is covered by indigent lakeside settlement area, at the time of mathematical settlement area, at the time of mathematical settlement or mitigate a control a) Measures to offset adverse effects on with the land use activity that cautactivity. d) Measures to fully offset the increase in same lake catchment. e) Contractual arrangements with third participation. 	22 provided the followin 4.2; or the sub-catchme r phosphorous from the nutrient management m ed to fully offset the effe ous forest cover or is or aking the application. vater quality, including s adverse effects on aqua use an increase in the export of nitrogen or	g conditions are met: ent groups have active nutrient proposed farming activity/farming leasures on land within the same lake acts of the proposed land use do not a land located within an urban area or urface water and groundwater. tic ecosystems in streams and rivers. kport of nitrogen or phosphorus from the r phosphorus from the activity within the

f) Where the offset is not applied on the property, the change to the nutrient benchmark limit for both properties. The nutrient benchmark for the property where the land use activity will take place will increase, and the property where offset measures will take place will decrease accordingly..
g) Information and monitoring requirements.'

	g) information and monitoring requirements.		
Panel Recommendations:	Reject		
Submission Number:	53: 52 Submission Type: Oppose		
Submitter:	Lachlan McKenzie		
Submission Summary:	The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our integrated nutrient management framework.		
Decision Sought:	 Delete and replace with: 'Rule 8 – Restricted Discretionary Activity The use of land for farming activities/farming enterprises on properties which do not meet Rule 7 is a Restricted Discretionary Activity from 1 January 2022 provided the following condition is met. a) The TLI for Lake Rotorua is at or below 4.2; and Matters of Discretion a) Measures to offset adverse effects on water quality, including surface water and groundwater. b) Measures to avoid, remedy or mitigate adverse effects on aquatic ecosystems in streams and rivers. c) Aspects of the land use activity that cause an increase in the export of nitrogen or phosphorus from the activity. d) Measures to fully offset the increase in the export of nitrogen or phosphorus from the activity. d) Measures to fully offset the increase in the export of nitrogen or phosphorus from the same lake catchment. e) Contractual arrangements with third parties where the offset measures are not applied on the property. f) Where the offset is not applied on the property where the land use activity will take place will increase, and the property where offset measures will take place will decrease accordingly. g) Information and monitoring requirements.' 		
Panel Recommendations:	Reject		
Submission Number:	53: 53 Submission Type: Oppose		
Submitter:	Lachlan McKenzie		
Submission Summary:	The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our integrated nutrient management framework.		
Decision Sought:	Delete.		
Panel Recommendations:	Reject		
Submission Number:	53: 54 Submission Type: Oppose		
Submitter:	Lachlan McKenzie		
Submission Summary:	The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our integrated nutrient management framework.		
Decision Sought:	Delete.		
Panel Recommendations:	Reject		
Submission Number:	53: 55 Submission Type: Oppose		
Submitter:	Lachlan McKenzie		
Submission Summary:	The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our integrated nutrient management framework.		
Decision Sought:	Delete.		
Panel Recommendations:	Reject		
Submission Number:	53: 56 Submission Type: Oppose		
Submitter:	Lachlan McKenzie		
Submission Summary:	The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our integrated nutrient management framework.		

Decision Sought:	Delete.		
Panel Recommendations:	Reject		
Submission Number:	64: 19 Submission Type: Support		
Submitter:	DairyNZ and Fonterra Co-operative Group Limited		
Submission Summary:	This rule allows more time for property owners who may not have realised that the Rotorua nutrient rules would impact their business, to work with the council before 2022.		
Decision Sought:	No changes requested.		
Panel Recommendations:	Reject		
Submission Number:	66: 5 Submission Type: Oppose		
Submitter:	Lake Rotorua Primary Producers Collective		
Submission Summary:	Prescriptive regulations will reduce innovation and drive behavior not conducive to sound environmental practices. There are too many big questions around the Lake biology, nutrients & the current proposed program to require anyone to be locked into a conditional consent.		
Decision Sought:	That farming in the catchment should be maintained as a permitted activity. Land owners operate at or below their bench mark figure and work to reduce nutrient loss from their property.		
Panel Recommendations:	Reject		
Submission Number:	66: 84 Submission Type: Oppose		
Submitter:	Lake Rotorua Primary Producers Collective		
Submission Summary:	The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our alternate integrated nutrient management framework.		
Decision Sought:	Delete and replace with the following, and any consequential amendments. Rule 1 - Permitted Activity The use of land for farming activities/farming enterprises on properties which are less than 5 hectares in area are permitted provided the following condition is met: a) The farming activities/farming enterprises do not comprise of any of the following land use activities: • Commercial cropping; or • Commercial horticulture; or • Dairy farming.		
Panel Recommendations:	Reject		
Submission Number:	66: 85 Submission Type: Oppose		
Submitter:	Lake Rotorua Primary Producers Collective		
Submission Summary:	The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our alternate integrated nutrient management framework.		
Decision Sought:	Delete and replace with the following, and any consequential amendments. Rule 2 - Permitted Activity The use of land for farming activities/farming enterprises on properties which are greater than 5 ha in area but less than 10 hectares in area are permitted provided the following conditions are met: a) The stocking rate on the property does not exceed the stocking rates specified in Schedule LR 2 at any point in time; and b) The farming activities/farming enterprises do not comprise of any of the following land use activities: • Commercial cropping; or • Commercial horticulture; or • Dairy farming		
Panel Recommendations:	Reject		
Submission Number:	66: 86 Submission Type: Oppose		
Submitter:	Lake Rotorua Primary Producers Collective		

Submission Summary:	The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our alternate integrated nutrient management framework.
Decision Sought:	 Delete and replace with the following, and any consequential amendments. Rule 3 – Permitted Activity The use of land for farming activities/farming enterprises on properties which are greater than 10 hectares in area or do not meet the conditions of Rules 1 and 2 are permitted provided the following conditions are met: a) The use of land for farming activities/farming enterprises on properties which are less than 40 hectares in area: The farming activities/farming enterprises will establish and will not exceed a nutrient benchmark in accordance with Schedule AA and provide that information to Council by 2017 b) The use of land for farming enterprises have a lawfully established nutrient benchmark for the property and will not exceed it; or will establish a nutrient benchmark in accordance with Schedule AA and provide that information to exceed it Dairy and dry stock farming activities/farming enterprises, excluding dairy support, will meet a managed reduction target agreed in accordance with Table LR 4 by 2022
Panel Recommendations:	Reject

Submission Number:	66: 87	Submission Type:	Oppose
Submitter:	Lake Rotorua Primary Producers Coll	ective	
Submission Summary:	The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our alternate integrated nutrient management framework.		
Decision Sought:	 catchment; and b) The nutrient management measured occur on land which is covered by individual lakeside settlement area Matters of control a) Measures to offset adverse effects b) Measures to avoid, remedy or mitig c) Aspects of the land use activity that activity. d) Measures to fully offset the increases same lake catchment. 	arming enterprises on prop the following conditions are en or phosphorous from the e of nutrient management r s used to fully offset the eff genous forest cover or is o on water quality, including a tate adverse effects on aqua cause an increase in the e e in the export of nitrogen of d parties where the offset m he property, the change to t r the property where the lar et measures will take place	erties which do not meet Rule 3 is a met: proposed farming activity/farming measures on land within the same lake fects of the proposed land use do not n land located within an urban area or surface water and groundwater. atic ecosystems in streams and rivers. export of nitrogen or phosphorus from the or phosphorus from the activity within the measures are not applied on the property he nutrient benchmark for both nd use activity will take place will
Panel Recommendations:	Reject		
Submission Number:	66: 88	Submission Type:	Oppose

Submission Summary: The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to

	our alternate integrated nutrient manage	nent framework.
Decision Sought:	 Restricted Discretionary Activity until 20. Matters of Discretion a) Measures to offset adverse effects on b) Measures to avoid, remedy or mitigate c) Aspects of the land use activity that ca activity. d) Measures to fully offset the increase is the same lake catchment. e) Contractual arrangements with third p f) Where the offset is not applied on the properties. The nutrient benchmark for the 	water quality, including surface water and groundwater. adverse effects on aquatic ecosystems in streams and rivers. use an increase in the export of nitrogen or phosphorus from the n the export of nitrogen or phosphorus from the activity within arties where the offset measures are not applied on the property. property, the change to the nutrient benchmark limit for both e property where the land use activity will take place will measures will take place will decrease accordingly.
Panel Recommendations:	Reject	
Submission Number:	66: 89	Submission Type: Oppose
Submitter:	Lake Rotorua Primary Producers Collec	ive

Submission Summary:	The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our alternate integrated nutrient management framework.
Decision Sought:	 Delete and replace with the following, and any consequential amendments. Rule 6 – Permitted Activity The use of land for farming activities/farming enterprises on properties which are greater than 10 hectares in area or which do not meet the conditions of Rules 1 and 2 are permitted from 2022 provided the following conditions are met: a) The TLI for Lake Rotorua is at or below 4.2; and b) The farming activities/farming enterprises have and do not exceed a lawfully established nutrient benchmark for the property in accordance with Rules 3; or in accordance with Rules 4 or 5.

Panel Recommendations:	Reject		
Submission Number:	66: 90	Submission Type:	Oppose
Submitter:	Lake Rotorua Primary Producers Collection	ve	
Submission Summary:	The alternate rules recommended give be alternate integrated nutrient management		WLP objectives and policies; and to our
Decision Sought:	Delete and replace with the following, and Rule 7 – Controlled Activity The use of land for farming activities/farmi (b) or (c) of Rule 6 are permitted from 202 a) The TLI for Lake Rotorua is at or below b) The increase in the export of nitrogen of enterprise will be fully offset by the use of catchment; and c) The nutrient management measures us occur on land which is covered by indigen lakeside settlement area, at the time of ma Matters of control a) Measures to offset adverse effects on w b) Measures to avoid, remedy or mitigate c) Aspects of the land use activity that cau activity. d) Measures to fully offset the increase in same lake catchment. e) Contractual arrangements with third pa f) Where the offset is not applied on the pu properties. The nutrient benchmark for the increase, and the property where offset m g) Information and monitoring requirement	ing enterprises on prope 2 provided the following 4.2; and or phosphorous from the nutrient management m sed to fully offset the effe ous forest cover or is or aking the application. water quality, including s adverse effects on aqua use an increase in the ex- the export of nitrogen or rties where the offset me roperty, the change to the e property where the land easures will take place	erties which do not meet the conditions conditions are met: proposed farming activity/farming heasures on land within the same lake ects of the proposed land use do not a land located within an urban area or surface water and groundwater. thic ecosystems in streams and rivers. sport of nitrogen or phosphorus from the r phosphorus from the activity within the easures are not applied on the property. he nutrient benchmark limit for both d use activity will take place will
Panel Recommendations:	Reject		

Submission Number:	66: 91 Submission Type: Oppose	
Submitter:	Lake Rotorua Primary Producers Collective	
Submission Summary:	The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and alternate integrated nutrient management framework.	to ou
Decision Sought:	 Delete and replace with the following, and any consequential amendments. Rule 8 – Restricted Discretionary Activity The use of land for farming activities/farming enterprises on properties which do not meet Rule 7 is Restricted Discretionary Activity from 1 January 2022 provided the following condition is met. a) The TLI for Lake Rotorua is at or below 4.2; and Matters of Discretion a) Measures to offset adverse effects on water quality, including surface water and groundwater. b) Measures to avoid, remedy or mitigate adverse effects on aquatic ecosystems in streams and ri c) Aspects of the land use activity that cause an increase in the export of nitrogen or phosphorus from the activity with same lake catchment. e) Contractual arrangements with third parties where the offset measures are not applied on the properties. The nutrient benchmark for the property where the land use activity will take place will increase, and the property where offset measures will take place will decrease accordingly. g) Information and monitoring requirements. 	vers. m the in the operty
Panel Recommendations:	Reject	
Submission Number:	70: 2 Submission Type: Oppose	
Submitter:	The Fertiliser Association of New Zealand	
Submission Summary:	FANZ oppose the use of 'input controls' in the rule framework. The policies do not promote an input control approach yet the rules do. An input control approach does not enable innovation and flexibilit farming options.	
Submission Summary: Decision Sought:	control approach yet the rules do. An input control approach does not enable innovation and flexibili	
	control approach yet the rules do. An input control approach does not enable innovation and flexibili farming options.	
Decision Sought:	control approach yet the rules do. An input control approach does not enable innovation and flexibili farming options. Not specified.	
Decision Sought: Panel Recommendations:	control approach yet the rules do. An input control approach does not enable innovation and flexibili farming options. Not specified. Reject	
Decision Sought: Panel Recommendations: Submission Number:	control approach yet the rules do. An input control approach does not enable innovation and flexibilities farming options. Not specified. Reject 70: 18 Submission Type: Oppose in Part	ty in
Decision Sought: Panel Recommendations: Submission Number: Submitter:	control approach yet the rules do. An input control approach does not enable innovation and flexibilit farming options. Not specified. Reject 70: 18 Submission Type: Oppose in Part The Fertiliser Association of New Zealand No rules in the Proposed Plan Change address the management of phosphorus. FANZ assumes C is convinced that phosphorus loss can be appropriately managed by way of the Nitrogen Management	ty in
Decision Sought: Panel Recommendations: Submission Number: Submitter: Submission Summary:	control approach yet the rules do. An input control approach does not enable innovation and flexibilities farming options. Not specified. Reject 70: 18 Submission Type: Oppose in Part The Fertiliser Association of New Zealand No rules in the Proposed Plan Change address the management of phosphorus. FANZ assumes C is convinced that phosphorus loss can be appropriately managed by way of the Nitrogen Management Plan.	ty in
Decision Sought: Panel Recommendations: Submission Number: Submitter: Submission Summary: Decision Sought:	control approach yet the rules do. An input control approach does not enable innovation and flexibilit farming options. Not specified. Reject 70: 18 Submission Type: Oppose in Part The Fertiliser Association of New Zealand No rules in the Proposed Plan Change address the management of phosphorus. FANZ assumes C is convinced that phosphorus loss can be appropriately managed by way of the Nitrogen Management Plan. Not specified.	ty in
Decision Sought: Panel Recommendations: Submission Number: Submitter: Submission Summary: Decision Sought: Panel Recommendations:	control approach yet the rules do. An input control approach does not enable innovation and flexibilit farming options. Not specified. Reject 70: 18 Submission Type: Oppose in Part The Fertiliser Association of New Zealand No rules in the Proposed Plan Change address the management of phosphorus. FANZ assumes C is convinced that phosphorus loss can be appropriately managed by way of the Nitrogen Management Plan. Not specified. Comment Noted	ty in
Decision Sought: Panel Recommendations: Submission Number: Submitter: Submission Summary: Decision Sought: Panel Recommendations: Submission Number:	control approach yet the rules do. An input control approach does not enable innovation and flexibilit farming options. Not specified. Reject 70: 18 Submission Type: Oppose in Part The Fertiliser Association of New Zealand No rules in the Proposed Plan Change address the management of phosphorus. FANZ assumes O is convinced that phosphorus loss can be appropriately managed by way of the Nitrogen Management Plan. Not specified. Comment Noted 70: 59 Submission Type: Oppose in Part	ty in
Decision Sought: Panel Recommendations: Submission Number: Submitter: Submission Summary: Decision Sought: Panel Recommendations: Submission Number: Submission Summary:	control approach yet the rules do. An input control approach does not enable innovation and flexibilit farming options. Not specified. Reject 70: 18 Submission Type: Oppose in Part The Fertiliser Association of New Zealand No rules in the Proposed Plan Change address the management of phosphorus. FANZ assumes O is convinced that phosphorus loss can be appropriately managed by way of the Nitrogen Managemer Plan. Not specified. Comment Noted 70: 59 Submission Type: Oppose in Part The Fertiliser Association of New Zealand If LR R2 conditions cannot be met, the activity becomes non-complying. There should be flexibility provide for restricted discretionary activity or discretionary activity where these conditions cannot be	ty in
Decision Sought: Panel Recommendations: Submission Number: Submitter: Submission Summary: Decision Sought: Panel Recommendations: Submission Number: Submission Number:	control approach yet the rules do. An input control approach does not enable innovation and flexibilit farming options. Not specified. Reject 70: 18 Submission Type: Oppose in Part The Fertiliser Association of New Zealand No rules in the Proposed Plan Change address the management of phosphorus. FANZ assumes O is convinced that phosphorus loss can be appropriately managed by way of the Nitrogen Management Plan. Not specified. Comment Noted 70: 59 Submission Type: Oppose in Part The Fertiliser Association of New Zealand If LR R2 conditions cannot be met, the activity becomes non-complying. There should be flexibility provide for restricted discretionary activity or discretionary activity where these conditions cannot be for example, more than a two year interval between harvest and planting. Insert restricted discretionary or discretionary criteria relevant to not complying with LR R2 in the	to
Decision Sought: Panel Recommendations: Submission Number: Submitter: Submission Summary: Decision Sought: Panel Recommendations: Submission Number: Submission Summary: Decision Sought:	control approach yet the rules do. An input control approach does not enable innovation and flexibility farming options. Not specified. Reject 70: 18 Submission Type: Oppose in Part The Fertiliser Association of New Zealand No rules in the Proposed Plan Change address the management of phosphorus. FANZ assumes Or is convinced that phosphorus loss can be appropriately managed by way of the Nitrogen Management Plan. Not specified. Comment Noted 70: 59 Submission Type: Oppose in Part The Fertiliser Association of New Zealand If LR R2 conditions cannot be met, the activity becomes non-complying. There should be flexibility provide for restricted discretionary activity or discretionary activity where these conditions cannot be for example, more than a two year interval between harvest and planting. Insert restricted discretionary or discretionary criteria relevant to not complying with LR R2 in the Proposed Plan Change.	ty in

Submission Summary:	Amend for improved clarity and consistency with the RPS and RWLP. The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our recommended changes to LR proposed policies. Most importantly it is our submission that the primary focus for these rules is the period to 2022. From 2020-23, the Rotorua Lakes WMA is scheduled to give effect to the NPS-FW and a consequential plan change. This plan change can be expected to review and confirm targets and limits beyond 2022, alongside methods and rules for achieving them.
Decision Sought:	Amend for improved clarity and consistency with the RPS and RWLP. The proposed changes to the table are extensive – please refer to the full submission for further detail.
Panel Recommendations:	Reject
Submission Number:	75: 177 Submission Type: Oppose
Submitter:	Federated Farmers of New Zealand
Submission Summary:	The alternate rules recommended by the submitter give better effect to RPS and RWLP objectives and policies; and to our recommended changes to LR proposed policies. It is the submitter's submission that the primary focus for these rules is the period to 2022.
Decision Sought:	Delete and replace with: Rule 1 - Permitted Activity The use of land for farming activities/farming enterprises on properties which are less than 5 hectares in area are permitted provided the following condition is met: a) The farming activities/farming enterprises do not comprise of any of the following land use activities: - Commercial cropping; or - Commercial horticulture; or - Dairy farming.
Panel Recommendations:	Reject
Submission Number:	75: 178 Submission Type: Oppose
Submitter:	Federated Farmers of New Zealand
Submission Summary:	The alternate rules recommended by the submitter give better effect to RPS and RWLP objectives and policies; and to our recommended changes to LR proposed policies. It is the submitter's submission that the primary focus for these rules is the period to 2022.
Decision Sought:	Delete and replace with: Rule 2 - Permitted Activity The use of land for farming activities/farming enterprises on properties which are greater than 5 ha in area but less than 10 hectares in area are permitted provided the following conditions are met: a) The stocking rate on the property does not exceed the stocking rates specified in Schedule XX at any point in time; and b) The farming activities/farming enterprises do not comprise of any of the following land use activities: - Commercial cropping; or - Commercial horticulture; or - Dairy farming
Panel Recommendations:	Reject
Submission Number:	75: 179 Submission Type: Oppose
Submitter:	Federated Farmers of New Zealand
Submission Summary:	The alternate rules recommended by the submitter give better effect to RPS and RWLP objectives and policies; and to our recommended changes to LR proposed policies. It is the submitter's submission that the primary focus for these rules is the period to 2022.
Decision Sought:	 Delete and replace with: Rule 3 – Permitted Activity The use of land for farming activities/farming enterprises on properties which are greater than 10 hectares in area, or do not meet the conditions of Rules 1 and 2, are permitted provided the following conditions are met: a) The use of land for farming activities/farming enterprises on properties which are less than 40

hectares in area:

- The farming activities/farming enterprises will establish a nutrient benchmark in accordance with Schedule AA and provide that information to Council by 2017, and will not exceed it

- The use of land for farming activities/farming enterprises on properties which are greater than 40 hectares in area:

- The farming activities/farming enterprises have a lawfully established nutrient benchmark for the property and will not exceed it; or will establish a nutrient benchmark in accordance with Schedule AA and provide that information to Council by 2017, and will not exceed it

- For the purpose of Rule 3 nutrient benchmark means Council was provided with a register of the annual average export of nitrogen and phosphorus from the property for the agreed benchmarking period.

Panel Recommendations:	Reject	
Submission Number:	75: 180 Sub	mission Type: Oppose
Submitter:	Federated Farmers of New Zealand	
Submission Summary:		ter give better effect to RPS and RWLP objectives and R proposed policies. It is the submitter's submission that 2022.
Decision Sought:	controlled activity the following conditions are m a)The increase in the export of nitrogen or phos enterprise will be fully offset by the use of nutrie catchment; and b)The nutrient management measures used to f	erprises on properties which do not meet Rule 3 is a et: ohorous from the proposed farming activity/farming nt management measures on land within the same lake ully offset the effects of the proposed land use do not rest cover or is on land located within an urban area or
Panel Recommendations:	Reject	
Submission Number:	75: 181 Sub	mission Type: Oppose
Submitter:	Federated Farmers of New Zealand	
Submission Summary:		ter give better effect to RPS and RWLP objectives and R proposed policies. It is the submitter's submission that 2022.
Decision Sought:	Delete and replace with Rule 5 – Restricted Discretionary Activity The use of land for farming activities/farming en Restricted Discretionary Activity:	erprises on properties which do not meet Rule 4 is a
	Matters of Discretion	
	 a) Measures to offset adverse effects on water of including consideration of measures which may 	uality, including surface water and groundwater, not be recognised in OVERSEER®
	b) Measures to avoid, remedy or mitigate adverse;c) Aspects of the land use activity that cause an activity.	se effects on aquatic ecosystems in streams and rivers. increase in the export of nitrogen or phosphorus from the port of nitrogen or phosphorus from the activity within the
	f) Where the offset is not applied on the property	here the offset measures are not applied on the property. t, the change to the nutrient benchmark limit for both erty where the land use activity will take place will as will take place will decrease accordingly.
Panel Recommendations:	Reject	
Submission Number:	75: 182 Sub	mission Type: Oppose
Submitter:	Federated Farmers of New Zealand	

Submission Summary:	The alternate rules recommended by the submitter give better effect to RPS and RWLP objectives and policies; and to our recommended changes to LR proposed policies. It is the submitter's submission that the primary focus for these rules is the period to 2022.
Decision Sought:	Delete.
Panel Recommendations:	Reject
Submission Number:	75: 183 Submission Type: Oppose
Submitter:	Federated Farmers of New Zealand
Submission Summary:	The alternate rules recommended by the submitter give better effect to RPS and RWLP objectives and policies; and to our recommended changes to LR proposed policies. It is the submitter's submission that the primary focus for these rules is the period to 2022.
Decision Sought:	Delete.
Panel Recommendations:	Reject
Submission Number:	75: 184 Submission Type: Oppose
Submitter:	Federated Farmers of New Zealand
Submission Summary:	The alternate rules recommended by the submitter give better effect to RPS and RWLP objectives and policies; and to our recommended changes to LR proposed policies. It is the submitter's submission that the primary focus for these rules is the period to 2022.
Decision Sought:	Delete.
Panel Recommendations:	Reject
Submission Number:	75: 185 Submission Type: Oppose
Submitter:	Federated Farmers of New Zealand
Submission Summary:	The alternate rules recommended by the submitter give better effect to RPS and RWLP objectives and policies; and to our recommended changes to LR proposed policies. It is the submitter's submission that the primary focus for these rules is the period to 2022.
Decision Sought:	Delete.
Panel Recommendations:	Reject
Submission Number:	75: 186 Submission Type: Oppose
Submitter:	Federated Farmers of New Zealand
Submission Summary:	The alternate rules recommended by the submitter give better effect to RPS and RWLP objectives and policies; and to our recommended changes to LR proposed policies. It is the submitter's submission that the primary focus for these rules is the period to 2022.
Decision Sought:	Delete.
Panel Recommendations:	Reject
Submission Number:	75: 187 Submission Type: Oppose
Submitter:	Federated Farmers of New Zealand
Submission Summary:	The alternate rules recommended by the submitter give better effect to RPS and RWLP objectives and policies; and to our recommended changes to LR proposed policies. It is the submitter's submission that the primary focus for these rules is the period to 2022.
Decision Sought:	Delete.
Panel Recommendations:	Reject
Submission Number:	75: 188 Submission Type: Oppose

Submitter:	Federated Farmers of New Zealand		
Submission Summary:	The alternate rules recommended by the policies; and to our recommended change the primary focus for these rules is the pe	es to LR proposed polici	
Decision Sought:	Delete.		
Panel Recommendations:	Reject		
Submission Number:	78: 10	Submission Type:	Oppose
Submitter:	Tony and Joanna Carr		
Submission Summary:	Land owners operate at or below their below their below their property.	nch mark figure and plar	n to manage a staged nutrient loss
Decision Sought:	That all expectations of reductions post 20 farming in the catchment should be maint		
Panel Recommendations:	Reject		
Submission Number:	83: 4	Submission Type:	Oppose
Submitter:	Bushlands Estate Limited and Adolle Farr	ms Limited	
Submission Summary:	The rules are unreasonable and inequitable when it is borne in mind that the nutrients from our farm do not reach the lake for approximately 80 years. It is clear that there are other solutions involving combinations of N and P that will achieve the same goal but in a much shorter time frame.		
Decision Sought:	Not specified.		
	Reject		

Section: LRR1 Up to 30/06/2017 farm activity in the catchment

Panel Recommendation

We concur with the Regional Council reporting officers' recommendations as contained in their s42A report and additional evidence presented during the hearing.

Submissions

Submission Number: Submitter:	12: 12 Submission Type: Oppose Astrid Coker		
Submission Summary:	Oppose the disallowance of higher nitrogen inputs in the future. Where science is unable to provide a solution of the famer is unable to remove stock from the property, the tactical use of nitrogen input may be required in order to mitigate the effect of pasture pests/diseases and climatic conditions.		
Decision Sought:	Allow tactical use of nitrogen input when	required.	
Panel Recommendations:	Accept in Part		
Submission Number:	21: 5	Submission Type:	Support in Part
Submitter:	Brown Owl Organics Incorporated		
Submission Summary:	This would not seem to allow the develop not exist from the date of notification.	ment of any commercial	cropping or horticulture where it does
Decision Sought:	Rewrite. We think landowners should be a area up to 0.4 hectares before resource of flexibility.	•	5
Panel Recommendations:	Accept in part		
Submission Number:	26: 27	Submission Type:	Support in Part
Submitter:	Rotorua Lakes Council		

Submission Summary:	RLC supports LR P9 and its accompanying rules (LRR1 - R7 and LRR13) in principle as far as they allow for reduced and more appropriate compliance costs for smaller land holders. PC 10 must allow the Rotorua communities to continue to provide for their social, cultural and economic well-being.		
Decision Sought:	Amend LR P9 and LR R1 to R7 and R13	to give effect to RLC's	submissions.
Panel Recommendations:	Reject in part		
Submission Number:	49: 63	Submission Type:	Oppose
Submitter:	CNI Iwi Land Management Ltd		
Submission Summary:	Unenforceable. There appears to be no d enable council to undertake compliance 1. Effective area 2. Nitrogen inputs 3. Stocking rates.	•	ssociated with this rule that would
Decision Sought:	Delete.		
Panel Recommendations:	Reject		
Submission Number:	64: 13	Submission Type:	Support
Submitter:	DairyNZ and Fonterra Co-operative Grou	p Limited	
Submission Summary:	All farming activities remaining PA with a	'hold the line' condition	until 30 June 2017 is practical.
Decision Sought:	No changes requested.		
Panel Recommendations:	Accept		

Section: LR R1(a)

Panel Recommendation

We concur with the Regional Council reporting officers' recommendations as contained in their s42A report and additional evidence presented during the hearing.

Submission Number:	43: 51	Submission Type:	Support in Part
Submitter:	Ravensdown Limited		
Submission Summary:	the volume of nitrogen loss and is and encourages innovation and fle it is unclear what the default rule is	not 'effects' based. Addressing exibility in farming operations. s if a property/farming enterpris	ut control does not necessarily relate to the farm system losses is effects based e cannot comply with condition (a), it wn supports the permitted activity status
Decision Sought:	increase in nitrogen loss from the onto, into or from land."; - Amend the plan to provide for an	date of notification that may con activity that does not comply w	ea, nitrogen inputs or stocking rates or ntribute to an increase in nitrogen loss vith condition (a) as a restricted matter than cannot be complied with.
Panel Recommendations:	Accept in Part		
Submission Number:	70: 57	Submission Type:	Oppose in Part
Submitter:	The Fertiliser Association of New	Zealand	
Submission Summary:		sing the farm system losses pro	elate to the volume of nitrogen loss vides for and encourages innovation
Decision Sought:	Amend LR R1(a):There is no incre from (date of notification).	ease in effective area, or increas	se in the nitrogen loss from land
Panel Recommendations:	Accept in Part		

Section: LRR2 From 1/07/2017 plantation forestry or bush/scrub

Panel Recommendation

Refer to the body of our report for our recommendation on this section.

Submissions

Submission Number:	3: 6	Submission Type:	Oppose
Submitter:	Kaingaroa Timberlands Partr	nership	
Submission Summary:	While it is usual for forests to be replanted in 2 years there may be times when this does not occur especially if there is a different owner of the land and the trees. At time of handback of land for a tree owner to the landowner it may take time for the landowner, often lwi to undertake any replanting. Land owners could be forced to apply for a non-complying resource consent. This is too onerous.		
Decision Sought:	Delete the reference to two ye	ear interval between harvesting and/o	r replanting.
Panel Recommendations:	Reject		
Further Submission(s)			
Further Submiss	ion No: 6 - 43	Submission Type	e: Support

CNI lwi Land Management Ltd

Further Submitter:

	Submission Sum	nmary:	For the reasons given in the original submission.
	Decision Sought	:	As above
	Panel Recomme	endation:	Reject
Submissi	ion Number:	26: 29	Submission Type: Support in Part
Submitte	r:	Rotorua Lake	es Council
Submissi	ion Summary:	for reduced a	s LR P9 and its accompanying rules (LRR1 - R7 and LRR13) in principle as far as they allow and more appropriate compliance costs for smaller land holders, PC 10 must allow the munities to continue to provide for their social, cultural and economic well-being.
Decision	Sought:	Amend LR P	9 and LR R1 to R7 and R13 to give effect to RLC's submissions.
Panel Re	ecommendations:	Reject in par	t
Submissi	ion Number:	37: 5	Submission Type: Oppose
Submitte	r:	Ngati Whaka	ue Tribal Lands Incorporation
Submissi	ion Summary:		restriction of forestry to 2.5kgN/ha/yr. The science is inconclusive on the N requirements for orestry (including tree crops e.g. manuka).
Decision	Sought:	types and rai	that commercial forestry be a range from 2.5 to 12.5kgN/ha/yr until leaching levels on soil infall bands within the catchment is confirmed through N leaching trials. Recommend that the from other land use blocks within the property be permitted.
Panel Re	ecommendations:	Reject	
Further	Submission(s)		
	Further Submissi	ion No:	6 - 44 Submission Type: Support
	Further Submitte	er:	CNI Iwi Land Management Ltd
	Submission Sum	nmary:	For the reasons given in the original submission.
	Decision Sought	:	As above
ļ	Panel Recomme	endation:	Reject
 Submiss ⁱ	ion Number:	49: 64	Submission Type: Oppose
Submitte	r:	CNI Iwi Land	Management Ltd
Submissi	ion Summary:	(LRR12) means no possibility capable of. T	nbined with the only other rule that appears to apply to land covered in production forestry ans that land presently covered in production forestry is locked into production forestry with of changing to any other land use. This is independent of what the underlying land is This rule renders this versatile land incapable of reasonable use, and places an unfair and e burden on CNI, the persons having an interest in the land (s85).
Decision	Sought:	Revise to per	rmit forestry to change to other land uses.
Panel Re	ecommendations:	Reject	
Further	Submission(s)		
	Further Submissi	ion No:	14 - 34 Submission Type: Support
	Further Submitte	er:	Hancock Forest Management (NZ) Ltd
	Submission Sum	nmary:	Supports the approach of making plantation forestry a permitted activity, reflecting that forestry as a land use has not contributed to the nutrient issues in the lake. However Hancock Forest Management is concerned that the rules effectively lock in forestry, thereby removing property rights from forestry as a land use because of its lesser
			contribution to the problem. This is inequitable and inconsistent with the purpose and principles of the RMA.

Panel Recomm	nendation: Reject			
Submission Number: Submitter:	64: 15 DairyNZ and Fonterra Co-operative Group Limite	Submission Type: ed	Support in Part	
Submission Summary:	DairyNZ/Fonterra suggests more prescriptive management of forestry harvest practices should be considered to ensure that pulses of sediment / P do not undermine the efforts of other land users.			
Decision Sought:	Reference the requirement to comply with sediments in this catchment add to the conditions in this	, , , , , , , , , , , , , , , , , , ,	e inadequate for the specific	

Panel Recommendations: Reject

Further Submission No:	6 - 45	Submission Type:	Oppose
Further Submitter:	CNI Iwi Land Managem	nent Ltd	
Submission Summary:	this plan change is pred sediment they need to pulse of sediment at ha sediment input from for differential for dairy con	dominantly on Nitrogen, and if rule apply to all land uses. While fore rvest, paired catchment studies h estry is still considerably lower the npared to forestry on Nitrogen alle	stry can have a recognizable have shown that overall the
Decision Sought:	As above		
Panel Recommendation:	Accept		

Submission Number:	66: 129	Submission Type:	Oppose
Submitter:	Lake Rotorua Primary Producers Collective		
Submission Summary:	bmission Summary: The Collective does not agree with the 320tN recorded as the reduction target. The RPS records this figure as 281tN therefore all other figures are affected.		
Decision Sought:	The RPS records this figure as 281tN therefore all other figures are affected.		
Panel Recommendations:	Reject		
Section: LR R2(a)			1067

Panel Recommendation

See Section on LR R2 above.

Submissions

Submission Number:	3: 6	Submission Type:	Oppose
Submitter:	Kaingaroa Timberlands Partner	rship	
Submission Summary:	While it is usual for forests to be replanted in 2 years there may be times when this does not occur especially if there is a different owner of the land and the trees. At time of handback of land for a tree owner to the landowner it may take time for the landowner, often lwi to undertake any replanting. Land owners could be forced to apply for a non-complying resource consent. This is too onerous.		
Decision Sought: Delete the reference to two year interval between harves			replanting.
Panel Recommendations:	Reject		
Further Submission(s)			
Further Submiss	ion No: 6 - 43	Submission Type:	Support

Further Submitter:

Submission Summary:		For the reasons given in the original submission.			
Decision Sought	Decision Sought:		As above		
Panel Recomme	endation:	Reject			
Submission Number:	3: 7		Submission Type:	Oppose	
Submitter:	Kaingaroa T	imberlands Partnershi	0		
bush/scrub l regulatory re planted area Within this c would be too areas.		There are areas of bush and scrub that do not fall within OVERSEER® scope of a plock. At the time of replant some areas of forests are not replanted for reasons such as equirements for setbacks from water, powerlines, and public roads. Furthermore there nons are not legally secured as required by the definition of permanently retired. At the time areas for mountain bike tracks and associated areas are not replanted. It is onerous for a landowner to have to apply for a non-complying activity for non-replanted areas are not replanted.			
Panel Recommendations:	Reject				
Further Submission(s)					
Further Submiss	Further Submission No:		Submission Type	e: Support	
Further Submitte	Further Submitter:		CNI Iwi Land Management Ltd		
Submission Sum	nmary:	For the reasons give	en in the original submission.		
Decision Sought	:	As above			
Panel Recommendation:		Reject			

Section: LR R2(c)

Panel Recommendation

See Section on LR R2 above.

Submissions

Submission Number:	43: 52	Submission Type:	Support in Part	
Submitter:	Ravensdown Limited			
Submission Summary:	the transfer of nitrogen loss entitlement sh	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. As currently drafted a non-complying consent is required and such an approach is not effects based and not directed by RPS provisions.		
Decision Sought:	Delete condition (c); Provide for the transfer of nitrogen loss entitlement should be provided for as a discretionary activity until 2022.			
Panel Recommendations:	Reject			
Submission Number:	70: 58	Submission Type:	Oppose in Part	
Submitter:	The Fertiliser Association of New Zealand	b		
Submission Summary:	Under the current wording any transfer of nitrogen from any part of the property would result in a forestry block not being a permitted activity. This would be a disincentive for transfer to or from non-forestry/bush/scrub areas of a farm/ farming enterprise.			
	Amend LR R2 (c) as follows: There is no transfer of nitrogen loss entitlement either to or from the plantation forestry or bush /scrub area.			
Decision Sought:				

Further Submission(s)

Further Submission No:	6 - 47	Submission Type:	Oppose
Further Submitter:	CNI Iwi Land Management Ltd		
Submission Summary:	Oppose in part. CNILML does not support the intent of Rule 2 in its entirety, due to its purpose of preventing any forestry block participating in any trades of nutrient discharge units, or changing land use.		
Decision Sought:	As above		
Panel Recommendation:	Reject		

Section: Advice note 1

Panel Recommendation

See Section on LR R2 above.

Submissions

Submission Number:	64: 14	Submission Type:	Support in Part
Submitter:	DairyNZ and Fonterra Co-operative Group Limited		
Submission Summary:	Dairy NZ/Fonterra agree with the clarification in the advice note that trees / scrub can be considered as a block within a property.		
Decision Sought:	No changes requested.		
Panel Recommendations:	Accept		
			1070

Section: LRR3 From 1/07/2017 farming activity 5ha or less

Panel Recommendation

Refer to the body of our report for our recommendation on this section.

Submissions

Submission Number:	26: 28	Submission Type:	Support in Part
Submitter:	Rotorua Lakes Council		
Submission Summary:	RLC supports LR P9 and its accompanying for reduced and more appropriate complia Rotorua communities to continue to provid	nce costs for smaller lar	nd holders, PC 10 must allow the
Decision Sought:	Amend LR P9 and LR R1 to R7 and R13 to	o give effect to RLC's s	submissions.
Panel Recommendations:	Reject in part		
Submission Number:	64: 16	Submission Type:	Support
Submitter:	DairyNZ and Fonterra Co-operative Group	Limited	
Submission Summary:	DairyNZ / Fonterra support the approach or property scale and the land use is less like		
Decision Sought:	No changes requested.		
Panel Recommendations:	Accept		
Submission Number:	65: 3	Submission Type:	Support
Submitter:	Peter Reed		
Submission Summary:	Some lower limit to the size of property is impractical and require huge resources for to the nutrient flow to Lake Rotorua. The 5 likely un-intensive non-commercial propert consideration of the practicality of many of OVERSEER®).	both compliance and end hectare limit is a good of ties. Any reduction to the	nforcement – with little if any reduction demarcation, between what are most e limit will also demand new
Decision Sought:	Support the intention to allow as a permitter properties/farming enterprises 5 hectares of land use."		
Panel Recommendations:	Accept		
Submission Number:	66: 130	Submission Type:	Oppose

Submitter:	Lake Rotorua Primary Producers Collective
Submission Summary:	The Collective does not agree with the 320tN recorded as the reduction target. The RPS records this figure as 281tN therefore all other figures are affected.
Decision Sought:	The RPS records this figure as 281tN therefore all other figures are affected.
Panel Recommendations:	Reject

Section: LR R3(a)

Panel Recommendation

See Section LR R3 above.

Submissions

Submission Number:	21: 6	Submission Type:	Support in Part
Submitter:	Brown Owl Organics Incorporat	ed	
Submission Summary:	classed as commercial. We sug	gest placing a minimum land area	a on commercial activity before it h very small commercial operations from
Decision Sought:		to: "No commercial cropping over area, nor commercial dairying oc	0.4 hectares in area, nor commercial ccurs on the land;"
Panel Recommendations:	Accept in Part		
Submission Number: Submitter:	49: 65 CNI Iwi Land Management Ltd		Submission Type: Oppose
Submission Summary:	The list of activities is incomplet was to grow a cut and carry fold		
Decision Sought:		ying.	ay] >10kg/Ha N". s of horticulture, cropping, fodder crops,
Panel Recommendations:	Accept in Part		

Section: LR R3(b)

Panel Recommendation

See Section LR R3 above.

Submissions

Submission Number:	43: 53	Submission Type: Support in Part
Submitter:	Ravensdown Limited	
Decision Sought:	Delete condition (b);Provide for the transfer of nitrogen loss entitle discretionary activity until 2022.	ment should be provided for as a
Panel Recommendations:	Reject	

1072

Section: LRR4 From 1/07/2017 farm activity 5ha - 10ha effective area

Panel Recommendation

Refer to the body of our report for our recommendation on this section.

Submissions				
Submission Number: Submitter:	8: 1 Submission Type: Oppose Grant Stewart			
Submission Summary:	This is unfair to all the land owners. There are many who have been assessed and given less than 5ha of effective land. EBOP have spent a considerable amount of money and resources over the last 16 months telling land owners/lifestyle property owners what their effective area of land is that they can graze on their property. We have been told this effective land area is what out nitrogen and stock allocation is based one.			
Decision Sought:	If the line in the sand for permitted activities not requiring resource consent is 5ha land size then it should be fair and much preferred option and be based on 5ha of effective land.			
Panel Recommendations:	Accept			
Submission Number:	15: 4 Submission Type: Oppose			
Submitter:	Murray and Robyn Pearce			
Submission Summary:	The rule targets small landholdings under 40 hectares. The rules will result in neighboring properties on the same LUC category being entitled to use their land in different ways. These rules are based on protecting present sector uses not possible future. The rules allow the catchment to be uses as a feed pad using outside fodder sources, yet disallows the small in catchment blocks to provide in catchment fodder for in catchment feeding.			
Decision Sought:	We proposed the rules be amended to state that all fodder consumed in the catchment be produced in the catchment.			
Panel Recommendations:	Reject			
Further Submission(s)				
Further Submiss	ion No: 17 - 3 Submission Type: Support			
Further Submitte	er: Murray and Robyn Pearce			
Submission Sur	nmary: For the reasons given in the original submission.			
Decision Sought	:: As above			
Panel Recomme	endation: Reject			
ubmission Number:	21: 2 Submission Type: Support in Part			
Submitter:	Brown Owl Organics Incorporated			
Submission Summary:	Landowners on slightly larger blocks should still have the flexibility to start an organic market garden or orchard on a small effective area of 0.4ha.			
Decision Sought:	We seek for this to be changed to: "The use of land for farming activities on properties/farming enterprises greater than 5 hectares in area or between 5 hectares and 10 hectares or less in effective area from 1 July 2017 provided there is no intensive land use over 0.4 hectares in area."			
Panel Recommendations:	Accept in Part			
Submission Number: Submitter:	26: 30 Submission Type: Support in Part Rotorua Lakes Council			
Submission Summary:	RLC supports LR P9 and its accompanying rules (LRR1 - R7 and LRR13) in principle as far as they allow for reduced and more appropriate compliance costs for smaller land holders, PC 10 must allow the Rotorua communities to continue to provide for their social, cultural and economic well-being.			
Decision Sought:	Amend LR P9 and LR R1 to R7 and R13 to give effect to RLC's submissions.			

Submission Number:	43: 54	Submission Type: O	ppose in Part
Submitter:	Ravensdown Limited		
Submission Summary:	While it supports the intent, the submitter co thing and the first bullet point can be delete		ullet points say essentially the same
Decision Sought:	Delete the first bullet point in the rule.		
Panel Recommendations:	Accept		
Submission Number:	56: 6	Submission Type:	Support
Submitter:	Bay of Plenty Regional Council		
Submission Summary:	Second bullet point is unnecessary as segn	nent is covered in first l	bullet point.
Decision Sought:	Remove second bullet point as unnecessar of land for farming activities on properties/f and including 10 hectares. Consequential u	arming enterprises gre	ater than five hectares in area and up to
Panel Recommendations:	Accept		
Submission Number:	64: 17	Submission Type:	Support
Submitter:	DairyNZ and Fonterra Co-operative Group	Limited	
Submission Summary:	DairyNZ / Fonterra support the approach of use activity is less likely to result in contam		tive rules to properties where the land
Decision Sought:	No changes requested.		
Panel Recommendations:	Accept		
Submission Number:	70: 62	Submission Type:	Support in Part
Submitter:	The Fertiliser Association of New Zealand		
Submission Summary:	'Five hectares in effective area' must be at bullet points be combined.	least 'five hectares in a	rea', therefore it is suggested that the
Decision Sought:	Combine first two bullet points; as follows: • hectares in effective area.	Greater than five hect	ares in area and up to and including 10

Section: LR R4(a)

Panel Recommendation

See Section LR R4 above.

Submissions

Submission Number:	6: 1	Submission Type:	Oppose
Submitter:	Robert Mackay		
Submission Summary:	The stocking rates are too restrictive. A pr stock than ourselves due to our size. No allowance is made for the fact that sel several months to replace stock. There wi months. It is very difficult to purchase exact numbe overstocked or ends up below the allowab	ldom is one able to repla ill be little or even no sto ers requires in a cattle m	ace stock immediately. It can often take ick on the property for several weeks or arket so one either ends up
Decision Sought:	More flexibility with stock numbers and an for resource consents.	increase in stocking rate	es allowed without the need
Panel Recommendations:	Reject		

Submission Number:	70: 60	Submission Type:	Support	
Submitter:	The Fertiliser Association of New Zealand			
Submission Summary:	Support LR R4 (a) and (b).			
Decision Sought:	Retain LR R4 (a) and (b).			
Panel Recommendations:	Accept			
			1075	
Section: LR R4(b)				

Panel Recommendation

See Section LR R4 above.

Submissions

Submission Number:	21: 7	Submission Type:	Support in Part
Submitter:	Brown Owl Organics Incorporated		
Submission Summary:	Nowhere in the plan is "commercial" define classed as commercial. We suggest placir becomes a controlled activity is a clear wa larger operations.	ng a minimum land area	a on commercial activity before it
Decision Sought:	We seek for this to be changed to: "No cor horticulture over 0.4 hectares in area occu		0.4 hectares in area, nor commercial
Panel Recommendations:	Accept in Part		
Submission Number:	49: 66	Submission Type:	Oppose
Submitter:	CNI lwi Land Management Ltd		
Submission Summary:	The attempt here is to create a de minimus The list of activities is incomplete and only was to grow a cut and carry fodder crop, o response, even though both of these activi	partially related to the p r fodder for dairy suppo	problem of leaching. E.g. if someone
Decision Sought:	Reword LR R4b as "no land use that has a Add a table to Schedule Three that identifi dairy support, drystock and dairying. Refer to the table created in schedule 3 in	es the leaching profiles	
Panel Recommendations:	Accept in Part		
Submission Number:	70: 61	Submission Type:	Support
Submitter:	The Fertiliser Association of New Zealand	I	
Submission Summary:	Support LR R4 (a) and (b).		
Decision Sought:	Retain LR R4 (a) and (b).		
Panel Recommendations:	Accept		

Section: LR R4(c)

Panel Recommendation

See LR R4 above.

Submissions

Submitter:	Ravensdown L	Limited		
Submission Summary:	Ravensdown on the reference.	pposes an input control a	approach and seeks for co	ndition (c) to be amended to delete
Decision Sought:		ogen loss from the date		, nitrogen inputs or stocking rates or tribute to an increase in nitrogen loss
Panel Recommendations:	Reject			
Submission Number:	70: 63		Submission Type:	Oppose in Part
Submitter:	The Fertiliser A	Association of New Zeala	and	
Submission Summary:	should be pern a simple look u approach not r allowance mad	nitted where nitrogen loss up table as a default for lo eplace it. It should be cle le for permitted activities may exceed the table rat	s is known to be within acc ow intensity farming. This c ar what N loss value is rep based on meeting these n	s based. Increasing stocking rates eptable limits. There may be a place for lefault should support an output based resented by the look up table and itrogen loss values even where ided in the Advice note for LR R4 and in
Decision Sought:	of nitrogen loss	s presented in Schedule tes presented in Schedule	LR Two, or as an alternativ	se in the nitrogen loss beyond the leve re, no increase at any point in time of this level of nitrogen loss from land
Panel Recommendations:	Accept in Part			
Submission Number:	92: 2		Submission Type:	Support in Part
Submitter:	Bay of Plenty F	Regional Council		
Submission Summary:	The text '[date	of notification]' needs to	be updated to include actu	al date of notification
Decision Sought:	Replace '[date	of notification]' reference	with 29 February 2016	
Panel Recommendations:	Accept			
Further Submission(s)				
Further Submiss	ion No:	6 - 72	Submission Typ	e: Support
Further Submitte	er:	CNI Iwi Land Manageme	ent Ltd	
Submission Summary		For the reasons given in	the original submission	

Submission Summary: For the reasons given in the original submission. **Decision Sought:**

As above

Panel Recommendation: Accept

Section: LR R4(d)

Panel Recommendation

See Section LR R4 above.

Submissions

Submission Number:	43: 56	Submission Type:	Oppose in Part
Submitter:	Ravensdown Limited		
Submission Summary:	Condition (d) should be deleted and the tradiscretionary activity until 2022.	ansfer of nitrogen loss e	ntitlement should be provided for as a
Decision Sought:	Delete condition (d). Provide for transfers	as a discretionary activit	y until 2022.

Panel Recommendations:	Reject		
Submission Number:	70: 64	Submission Type:	Oppose in Part
Submitter:	The Fertiliser Association of New Zealance	ł	
Submission Summary:	There is no time frame to LR R4 so under (d) properties up to 10 ha are not permitted to transfer N loss entitlement after 2022. Transfer of nitrogen loss entitlement for increased efficiency should, in principle, be provided for. The prevention of transfer of nitrogen loss is only acceptable if the land is too small for administrative efficiency, or under a consenting process. If these reasons do not apply, then transfer of nitrogen loss entitlement should be provided for as a permitted activity.		
Decision Sought:	If the transfer of nitrogen loss entitlements consenting process, it should be provided	,	,
Panel Recommendations:	Reject		

Section: LRR5 From 1/07/2017 to 30/06/2022 farm activity 10ha to 40ha effective area or not permitted

Panel Recommendation

We concur with the Regional Council reporting officers' recommendations as contained in their s42A report and additional evidence presented during the hearing.

Submissions

Submission Number:	26: 31	Submission Type: Support in Part
Submitter:	Rotorua Lakes Cour	ncil
Submission Summary:	for reduced and mor	and its accompanying rules (LRR1 - R7 and LRR13) in principle as far as they allow e appropriate compliance costs for smaller land holders, PC 10 must allow the s to continue to provide for their social, cultural and economic well-being.
Decision Sought:	Amend LR P9 and L	R R1 to R7 and R13 to give effect to RLC's submissions.
Panel Recommendations	s: Reject in part	
Submission Number:	64: 18	Submission Type: Support
Submission Number: Submitter:		Submission Type: Support a Co-operative Group Limited
	DairyNZ and Fontern DairyNZ / Fonterra r and therefore suppo	
Submitter:	DairyNZ and Fontern DairyNZ / Fonterra r and therefore suppo	a Co-operative Group Limited ecognise the practical implementation issues that the council will have to manage rt the lesser reporting requirements for these properties that apply until 2022, at ome fully aligned with the requirements applying to the larger properties.

Section: LR R5(a)

Panel Recommendation

See Section LR R5 above.

Submissions

Submission Number:	21: 8	Submission Type:	Support in Part
Submitter:	Brown Owl Organics Incorporated		
Submission Summary:	This would not seem to allow the develop not exist from the date of notification. We organic horticulture business on an area needs to be re-written to allow this flexibil	think landowners should up to 0.4 hectares before	be permitted to develop a small
Decision Sought:	We think landowners should be permitted	to develop a small organ	nic horticulture business on an area up

to 0.4 hectares before resource consent. The condition needs to be re-written to allow this flexibility.

43: 57		Submission Type:	Oppose in Part	
Ravensdown	Limited			
Ravensdown reference.	opposes an input control app	roach and seeks for co	ndition (a) to be amended to delete the	
increase in nit	rogen loss from the date of n			
Reject				
70: 66		Submission Type:	Support	
The Fertiliser	Association of New Zealand			
It is recognise	d that record keeping is impo	rtant and a clear scheo	ule for records to be kept is supported.	
Retain LR R5	(b) as record keeping is requ	ired to account for nutr	ient losses.	
Accept				
92: 3		Submission Type:	Support in Part	
Bay of Plenty	Regional Council			
The text '[date	e of notification]' needs to be u	updated to include actu	al date of notification.	
Replace '[date of notification]' reference with 29 February 2016				
Accept				
on No:	6 – 73	Submission Type: Su	pport	
r:	CNI Iwi Land Management	Ltd		
Submission Summary: For the reasons given in the original submission.				
	As above			
ndation:	Accept			
	Ravensdown reference. Amend condit increase in nit onto, into or fr Reject 70: 66 The Fertiliser It is recognise Retain LR R5 Accept 92: 3 Bay of Plenty The text '[date Replace '[date Accept	reference. Amend condition (a) to read "there is no indincrease in nitrogen loss from the date of nonto, into or from land." Reject 70: 66 The Fertiliser Association of New Zealand It is recognised that record keeping is impo Retain LR R5 (b) as record keeping is requinant Accept 92: 3 Bay of Plenty Regional Council The text '[date of notification]' needs to be a Replace '[date of notification]' reference with Accept on No: $6 - 73$:: CNI Iwi Land Management mary: For the reasons given in the As above	Ravensdown opposes an input control approach and seeks for correference. Amend condition (a) to read "there is no increase in effective areal increase in nitrogen loss from the date of notification that may corronto, into or from land." Reject 70: 66 Submission Type: The Fertiliser Association of New Zealand It is recognised that record keeping is important and a clear scheor Retain LR R5 (b) as record keeping is required to account for nutre Accept 92: 3 Submission Type: Bay of Plenty Regional Council The text '[date of notification]' needs to be updated to include actu Replace '[date of notification]' reference with 29 February 2016 Accept on No: 6 – 73 Submission Type: Su on No: 6 – 73 Submission Type: Su mary: For the reasons given in the original submission. As above As above	

Panel Recommendation

See Section LR R5 above.

Submissions

Submission Number:	49: 67	Submission Type:	Support
Submitter:	CNI Iwi Land Management Ltd		
Submission Summary:	Support.		
Decision Sought:	Retain.		
Panel Recommendations:	Accept		

Submission Number:	70: 65		Submission Type:	Oppose in Part		
Submitter:	Submitter: The Fertiliser Association of New Zealand					
Submission Summary:	extensive that		Schedule LR Three. It m	elling, the record required will be more hay be that the current Schedule LR are minimum.		
Decision Sought:	Amend LR R (date of notif		effective area, increase	in the nitrogen loss from land from		
Panel Recommendations:	Reject					
Further Submission(s)						
Further Submiss	sion No:	15 - 46	Submission Typ	be: Support		
Further Submitte	ər:	Ballance Agri-Nutrients Limited				
Submission Sun	nmary:	Ballance supports the intent of Rule LR R5 and the recommended amendments by FANZ. Ballance opposes an input-based approach to nutrient management.				
Decision Sought	t:	As above				

Panel Recommendation:

Section: LR R5(c)

Panel Recommendation

See Section LR R5 above.

Submissions

Submission Number:	43: 58	Submission Type:	Oppose in Part	
Submitter:	Ravensdown Limited			
Submission Summary:	Condition (c) should be deleted and the transfer of nitrogen loss entitlement should be provided for as a discretionary activity until 2022.			
Decision Sought:	Delete condition (c). Provide for transfers	as a discretionary activit	y until 2022.	
Panel Recommendations:	Reject			

Section: LRR6 Farm activity not previously managed by Rule 11

Reject

Panel Recommendation

We concur with the Regional Council reporting officers' recommendations as contained in their s42A report and additional evidence presented during the hearing.

Submissions

Submission Number:	26: 32	Submission Type:	Support in Part
Submitter:	Rotorua Lakes Council		
Submission Summary:	RLC supports LR P9 and its accompanying allow for reduced and more appropriate of Rotorua communities to continue to provi	compliance costs for sma	ller land holders, PC 10 must allow the
Decision Sought:	Amend LR P9 and LR R1 to R7 and R13	to give effect to RLC's s	submissions.
Panel Recommendations:	Reject in part		
Submission Number:	43: 59	Submission Type:	Oppose
Submitter:	Ravensdown Limited		
Submission Summary:	It is not clear why a particular rule is requ	ired for those properties	that were 'not previously managed'.

1081

This brings in a new level of complexity that does not seem warranted. The rule could include properties that were not 'actively' managed in accordance with these old rules.

Section: LR R6(a) Panel Recommendation See Section LR R6 above. Submissions Submission Number: 70: 68 Submission Type: Support	Decision Sought:	Delete Rule LR R6.		
Submitter: Ravensdown Limited Submitter: 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. Decision Sought: If Council retains the rule amend the title (in bold) to provide for farming activities that are not otherwise permitted by Rules R2, R3, R4, or R5. Panel Recommendations: Reject Submitsein Number: 64: 19 Submission Summary: This rule allows more time for property owners who may not have realised that the Rotorua nutrient rules would impact their business, to work with the council before 2022. Decision Sought: No changes requested. Panel Recommendations: Accept Submission Number: 65: 4 Submission Summary: This rule could be read as meaning that after 30 June 2022, all activities are not permitted (on properties/farming enterprises not previously managed by Rules 11 to 11F). This is not what is intended. It may be that LR R8 is intended to calify this – in which case the link between LR R6 and LR R8 needs to be clearer. Decision Sought: Needs rewording to make clearer that after 30 June 2022, activities permitted under LR R3 (and others) will still be permitted. Panel Recommendations: Accept in Part Submission Sought: Needs rewording to make clearer that after 30 June 2022, activities permitted under LR R3 (and others) w	Panel Recommendations:	Reject		
Submission Summary: 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. Decision Sought: If Council retains the rule amend the title (in bold) to provide for farming activities that are not otherwise permitted by rules R2, R3, R4, or R5. Panel Recommendations: Reject Submission Number: 64: 19 Submission Summary: This rule allows more time for property owners who may not have realised that the Rotorua nutrient rules would impact their business, to work with the council before Submission Summary: This rule allows more time for property owners who may not have realised that the Rotorua nutrient rules would impact their business, to work with the council before Submission Number: 65: 4 Submission Type: Oppose Submission Summary: This rule could be read as meaning that after 30 June 2022, all activities are not permitted (on properties/farming enterprises not previously managed by Rules 11 to 11F). This is not what is intended. It may be that LR R8 is intended to clarify this – in which case the link between LR R6 and LR R8 needs to be clearer. Decision Sought: Needs rewording to make clearer that after 30 June 2022, activities permitted under LR R3 (and others) will still be permitted. Panel Recommendations: Accept in Part Section: LR R6(a) Panel Recommendations: </td <td>Submission Number:</td> <td>43: 62</td> <td>Submission Type:</td> <td>Support in Part</td>	Submission Number:	43: 62	Submission Type:	Support in Part
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Panel Recommendations: Reject Submission Number: 64: 19 Submission Type: Support Submission Number: DairyNZ and Fonterra Co-operative Group Limited Support Submission Summary: This rule allows more time for property owners who may not have realised that the Rotorua nutrient rules would impact their business, to work with the council before 2022. Decision Sought: No changes requested. Panel Recommendations: Accept Submission Number: 65: 4 Submission Summary: This rule could be read as meaning that after 30 June 2022, all activities are not permitted (on properties/farming enterprises not previously managed by Rules 11 to 11F). This is not what is intended. It may be that LR RB is intended to clarify this – in which case the link between LR R6 and LR R8 needs to be clearer. Decision Sought: Needs rewording to make clearer that after 30 June 2022, activities permitted under LR R3 (and others) will still be permitted. Panel Recommendations: Accept in Part Section: LR R6(a) Panel Recommendations: Submission Type: Support See Section LR R6 above. Submission Type: Support	Submission Summary:	permitted by Rules R2 to R5, however	•	0
Submission Number: 64: 19 Submission Type: Support Submission Number: DairyNZ and Fonterra Co-operative Group Limited Submission Summary: This rule allows more time for property owners who may not have realised that the Rotorua nutrient rules would impact their business, to work with the council before 2022. Decision Sought: No changes requested. Panel Recommendations: Accept Submission Number: 65: 4 Submission Type: Oppose Submission Summary: Peter Reed Submission Summary: This rule could be read as meaning that after 30 June 2022, all activities are not permitted (on properties/farming enterprises not previously managed by Rules 11 to 11F). This is not what is intended. It may be that LR R8 is intended to clarify this – in which case the link between LR R6 and LR R8 needs to be clearer. Decision Sought: Needs rewording to make clearer that after 30 June 2022, activities permitted under LR R3 (and others) will still be permitted. Panel Recommendations: Accept in Part Section: LR R6(a) Panel Recommendations: Accept in Part Submission Number: 70: 68	Decision Sought:		tle (in bold) to provide for fa	arming activities that are not otherwise
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Submitter: Peter Reed Submission Summary: This rule could be read as meaning that after 30 June 2022, all activities are not permitted (on properties/farming enterprises not previously managed by Rules 11 to 11F). This is not what is intended. It may be that LR R8 is intended to clarify this – in which case the link between LR R6 and LR R8 needs to be clearer. Decision Sought: Needs rewording to make clearer that after 30 June 2022, activities permitted under LR R3 (and others) will still be permitted. Panel Recommendations: Accept in Part Section: LR R6(a) Panel Recommendation Section LR R6 above. Submission Number: 70: 68	Panel Recommendations:	Accept		
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will still be permitted. intervention in the interventin the intervention intervention in the intervention in the interv	Submission Summary:	properties/farming enterprises not prev It may be that LR R8 is intended to cla	viously managed by Rules	11 to 11F). This is not what is intended.
Section: LR R6(a) 100 Panel Recommendation See Section LR R6 above. 100 Submissions Submission Number: 70: 68 Submission Type: Support	Decision Sought:	0	after 30 June 2022, activiti	es permitted under LR R3 (and others)
Section: LR R6(a) Panel Recommendation See Section LR R6 above. Submissions Submission Number: 70: 68 Submission Type: Support	Panel Recommendations:	Accept in Part		
Panel Recommendation See Section LR R6 above. Submissions Submission Number: 70: 68 Submission Type: Support	Section: LR R6(a)			1083
See Section LR R6 above. Submissions Submission Number: 70: 68 Submission Type: Support	.,			
Submission Number: 70: 68 Submission Type: Support		/11		
Submission Number: 70: 68 Submission Type: Support				
		70: 68	Submission Type	Support
Submuter: I De Ferruiser Association of New Zealand	Submitter:	The Fertiliser Association of New Zeal		

Panel Recommendations: Accept

Support LR R6 (a).

Retain LR R6 (a).

Submission Summary:

Decision Sought:

Panel Recommendatio	n					
See Section LR R6 abov						
Submissions						
Submission Number:	21: 9	Submission Type: Support in Part				
Submitter:	Brown Owl	Organics Incorporated				
Submission Summary:	not exist fro organic hor	not seem to allow the development of any commercial cropping or horticulture where it does m the date of notification. We think landowners should be permitted to develop a small ticulture business on an area up to 0.4 hectares before resource consent. The condition re-written to allow this flexibility.				
Decision Sought:		ndowners should be permitted to develop a small organic horticulture business on an area up res before resource consent. The condition needs to be re-written to allow this flexibility.				
Panel Recommendations:	Accept in P	art				
Submission Number:	43: 60	Submission Type: Support in Part				
Submitter:	Ravensdow	Ravensdown Limited				
Submission Summary:		etains the rule Ravensdown opposes an input control approach and seeks for condition (b) to d to delete the reference.				
Decision Sought:	Amend condition (b) to read "there is no increase in effective area, nitrogen inputs or stocking rates or nitrogen loss from the date of notification that may contribute to an increase in nitrogen loss onto, into or from land."					
Panel Recommendations:	Reject					
Submission Number:	70: 67	Submission Type: Oppose in Part				
Submitter:	The Fertilise	er Association of New Zealand				
Submission Summary:		vides a holding pattern until 2022 with the intention that no increase in nitrogen loss should approach is supported but rather than limit inputs it should be clear that it is the N loss that is ussed.				
Decision Sought:	Amend LR (date of not	R6(b): There is no increase in effective area, increase in the nitrogen loss from land from ification).				
Panel Recommendations:	Reject					
Further Submission(s)						
Further Submiss	ion No:	15 - 47 Submission Type: Support				
Further Submitte	er:	Ballance Agri-Nutrients Limited				
Submission Summary: Decision Sought:		Ballance supports the intent of Rule LR R6 and the recommended amendments by FANZ Ballance opposes an input-based approach to nutrient management				
		As above				
Panel Recomme	endation:	Reject				
Submission Number:	92: 4	Submission Type: Support in Part				
Submitter:	Bay of Plen	ty Regional Council				
Submission Summary:	The text '[da	ate of notification]' needs to be updated to include actual date of notification.				
Decision Sought:	Replace '[da	ate of notification]' references with 29 February 2016.				

Further Submission(s)

Further Submission No:	6 - 74	Submission Type:	Support	
Further Submitter:	CNI Iwi Land Management Ltd			
Submission Summary:	For the reasons given in th	For the reasons given in the original submission.		
Decision Sought:	As above			
Panel Recommendation:	Accept			

Section: LR R6(c)

Panel Recommendation

See Section LR R6 above.

Submissions

Submission Number:	49: 68	Submission Type:	Support
Submitter:	CNI Iwi Land Management Ltd		
Submission Summary:	Support.		
Decision Sought:	Retain.		
Panel Recommendations:	Accept		
Submission Number:	70: 69	Submission Type:	Support
Submitter:	The Fertiliser Association of New Zealand		
Submission Summary:	Support LR R6 (c).		
Decision Sought:	Retain LR R6 (c).		

Section: LR R6(d)

Panel Recommendation

See Section LR R6 above.

Submissions

Submission Number:	43: 61	Submission Type:	Support in Part	
Submitter:	Ravensdown Limited			
Submission Summary:	If Council retains the rule condition (d) sh should be provided for as a discretionary		transfer of nitrogen	loss entitlement
Decision Sought:	If Council retains the rule condition (d) sh should be provided for as a discretionary		transfer of nitrogen	loss entitlement
Panel Recommendations:	Reject			
Submission Number:	49: 69	Submission Type:	Support	
Submitter:	CNI lwi Land Management Ltd			
Submission Summary:	Support.			
Decision Sought:	Retain.			
Panel Recommendations:	Accept			

1085

Section: LRR7 Low intensity farm activity

Panel Recommendation

Refer to the body of our report for our recommendation on this section.

Submissions

Submission Number:	26: 33	Submission Type:	Support in Part
Submitter:	Rotorua Lakes Council		
Submission Summary:	RLC supports LR P9 and its accompanyin for reduced and more appropriate complia Rotorua communities to continue to provid	ince costs for smaller lar	nd holders, PC 10 must allow the
Decision Sought:	Amend LR P9 and LR R1 to R7 and R13 t	o give effect to RLC's s	submissions.
Panel Recommendations:	Reject in part		
Submission Number:	49: 70	Submission Type:	Support in Part
Submitter:	CNI Iwi Land Management Ltd		
Submission Summary:	Reword to read "the use of land for low int	ensity land use on prop	perties.
Decision Sought:	Reword to read "the use of land for low int	ensity land use on prop	perties.
Panel Recommendations:	Reject		

Further Submission(s)

	Further Submiss	ion No:	14 - 35	Submission Typ	e: Other	
	Further Submitte	er:	Hancock Forest Management (NZ) Ltd			
	Submission Summary:		How this rule applies to all properties in the catchment is currently unclear. If the intent is that all properties can operate under the rule then it is supported. If however the intent is that only land that is currently farmed can operate under this rule (as implied by clause g) then the rule is opposed on the basis of being not effects based and inequitable.			
	Decision Sought	:	As above			
[Panel Recomme	endation:	Reject			
Submissi	on Number:	56: 7		Submission Type:	Support	
Submitter	r:	Bay of Plenty Regional Council				
Submissi	on Summary:	The rule title includes the term "low intensity" which is unnecessary and potentially confusing as there no associated definition and different terms are used throughout the plan.			confusing as there is	
Decision	Sought:	Amend rule title to read: "LR R7 Permitted – From 1 July 2017, the use of land for farming activit properties/farming enterprises that demonstrate low nitrogen loss". Amend first paragraph to read use of land for farming activities on properties/farming enterprises in"			0	
Panel Re	commendations:	Reject				
Submissi	on Number:	56: 8		Submission Type:	Support	
Submitter	r:	Bay of Plenty	Regional Council			
Submissi	on Summary:	The figure of 68% of nitrogen loss generated by the drystock reference file equated to the bottom of the drystock range. The reference file needed to be reviewed due to the bug discovered as a result of the OVERSEER® 6.2.0/6.2.1. The review has resulted in slight changes to the reference file and therefore the % becomes 71%.		as a result of the		

Panel Recommend	lations: Accept	in Part			
Further Submis	sion(s)				
Further Submission No:		8 - 26	Submission Type:	Oppose	
Further Submitter:		Lake Rotorua Pi	Lake Rotorua Primary Producers Collective		
Submission Summary:		to achieving a si	The Collective oppose the methodology of Reference files. You cannot hold a land owner to achieving a single NDA figure when you are manipulating figures to averages and bugs in new OVERSEER® versions require changes to percentage figures		
Decision Sought:		As above		icentage ingules	
Panel Recommend	dation: Re	ject			
Submission Number	er: 56: 9		Submission Type:	Support	
Submitter:	Bay of F	Bay of Plenty Regional Council			
Submission Summary: Clar		ification is required on what low nitrogen losses are perceived to be.			
Decision Sought: Clarify th		hat low nutrient losses of	low nutrient losses cover activities that comply with the permitted criteria.		
Panel Recommend	lations: Accept				
Further Submis	sion(s)				
Further \$	Submission No:	6 - 48	Submission Type:	Support	
Further	Submitter:	CNI Iwi Land Management Ltd			
Submission Summar		For the reasons given in the original submission.			
Decision	Sought:	Clarify what low nitrogen loss activities are by way of a definition.			
Panel R	ecommendation:	Accept			
Submission Numb	er: 56: 12		Submission Type:	Support	
Submitter:		ay of Plenty Regional Council			
Submission Summ		Amend LR R7 to ensure that grazed trees allocations of nitrogen discharges remain at that level.			
Decision Sought:	"The us catchine • the eff of the n • the eff discharg permitte (a) Land activitie experied the 200 reference Benchm trees; a Either 1 Land confirm (includir describe Or 2 Provio demons	1 Land use information records must be submitted on an annual basis by 31 October each year to confirm that the property/farming enterprise's stocking rates, nitrogen inputs and areas of land use (including fodder cropping, cultivated area and land clearance) remain the same or less than the as described in (a)			
Panel Recommend	lations: Accept	Accept in Part			
	1.				

	Further Submission No: Further Submitter: Submission Summary:		8 - 27	Submission Type	e: Oppose
			Lake Rotorua Primary Producers Collective		
			owner to achieving a singl	e NDA figure when you	ence files. You cannot hold a land are manipulating figures to averages anges to percentage figures.
-	Decision Sought	:	As above		
L	Panel Recomme	endation:	Reject		
Submissic	on Number:	58: 16		Submission Type:	Support
Submitter:	:	Max Douglas	5		
Submissio	on Summary:	Support - cre	ates a connection between la	nd owners willing to run	at a low intensity and BoPRC staff.
Decision S	Sought:	No changes	requested.		
Panel Rec	commendations:	Accept			
Submissio	on Number:	64: 20		Submission Type:	Support
Submitter:	:	DairyNZ and	Fonterra Co-operative Group	Limited	
activity is less		s likely to result in contaminar in OVERSEER® file that may	t loss to water. We supp	les to properties where the land use port the recognition in this Rule that ns from those in the	
Decision S	Sought:	No changes	requested.		
Panel Rec	commendations:	Accept			
Further \$	Submission(s)				
	Further Submissi	ion No:	6 - 49	Submission Type	e: Support in Part
	Further Submitte	er:	CNI Iwi Land Management	Ltd	
	Submission Sum	imary:	activity that is regarded as a	a low intensity farm activ intensity rural activities	NILML also submits that the scope of ity includes forestry, by changing the on properties/rural enterprises" and
_	Decision Sought	:	Change the title of rule LRR enterprises" and make cons		ral activities on properties/rural at effect.
	Panel Recomme	ndation:	Reject		
Submissio	on Number:	65: 5		Submission Type:	Oppose
	:	Peter Reed			
Submitter:					
	on Summary:		/ reads properties under 5 hee		farming activities, must submit an ontrary to LR P9 (c).
Submissio	-	OVERSEER		ntended as it would be c	ontrary to LR P9 (c).
Submissio Decision S	-	OVERSEER	B file. This is presumably unit	ntended as it would be c	ontrary to LR P9 (c).
Submissio Decision S Panel Rec	Sought:	OVERSEER	B file. This is presumably unit	ntended as it would be c	ontrary to LR P9 (c).
Submissio Decision S Panel Rec Submissio	Sought: commendations: on Number:	OVERSEER® Should specif Reject 70: 70	B file. This is presumably unit	ntended as it would be c apply to properties that a	ontrary to LR P9 (c). are permitted under LR R3.
Submissio	Sought: commendations: on Number:	OVERSEER Should specif Reject 70: 70 The Fertiliser It is unclear w mean '…less	B file. This is presumably unit fically state the rule does not a Association of New Zealand whether the definition of 'low ir	ntended as it would be c apply to properties that a Submission Type: ntensity land use [farming a rate'. If that is the de	ontrary to LR P9 (c). are permitted under LR R3. Oppose g] activity' is defined in the preamble t finition it should be removed from this
Decision S Panel Rec Submissio Submitter:	Sought: commendations: on Number: on Summary:	OVERSEER Should specif Reject 70: 70 The Fertiliser It is unclear w mean '…less rule and place	Ifile. This is presumably unit fically state the rule does not a Association of New Zealand whether the definition of 'low ir than 68% of the nitrogen loss ed in the definitions section, a	Antended as it would be c apply to properties that a Submission Type: Atensity land use [farming a rate'. If that is the det s the term is referenced	ontrary to LR P9 (c). are permitted under LR R3. Oppose g] activity' is defined in the preamble t finition it should be removed from this

Submission Number:	92: 5	Submission Type:	Support in Part	
Submitter:	Bay of Plenty Regional Council			
Submission Summary:	This condition aligns with the conditions in other permitted activities in Plan Change 10 and should have been carried through to Rule LR R7.			
	The intent of Rule LR R7 was to allow hi uses without requiring consent. Without loss land use activities would be allowed with the treatment of other permitted activities activities activities would be allowed	this condition, an uninten to increase their nitroger	ded consequence could be low nitrogen	
Decision Sought:	Add condition (c) There is no increase in effective area or increase in nitrogen loss onto, into or fro	U	ebruary 2016 that may contribute to an	
Panel Recommendations:	Accept			
Further Submission(s)				

Further Submission No:	6 - 76	Submission Type:	Oppose
Further Submitter:	CNI Iwi Land Management Ltd		

Submission Summary:	CNIILML opposes Council using inconsistency as being more important than unfair, unreasonable and inequitable. The effect of adding condition (c) to rule LR R7 - to reduce inconsistency between rules - is to increase the unfair, unreasonable and inequitable treatment of those to whom that rule applies. CNIILML opposes the premises by which the Council has determined that high leaching land uses continue to be able to leach large amounts, and very low leaching land uses are denied any flexibility in their use of land. CNIILML believes that process by which this allocation arrangement was arrived at (of which rule LR R7 is part) has many procedural deficiencies, as well as producing an unfair and inequitable result. Rule LR R7 is one of a suite of rules that grandparent land use to its existing use. The changes sought to rule LR R7 by this submission further constrain low leaching land use, making it impossible for CNIILML to use the land for anything other than p. radiata plantation forestry. There are no other land uses that can meet the 2.5kgN/yr limit that has been imposed on the CNIILML forest. Not even returning some land to native vegetation. This degree of constraint, while other land users have a start point of 102kgN/Ha/yr, and an ability to trade, is extraordinarily inequitable.
Decision Soucht:	As the situation has arisen because CNIILML had no place at the table for allocation discussions, and because previous rules also ignored any lwi land issues (Rule 11), this result also has the unfortunate look of also being inequitable from the point of view of honouring the Treaty. Adding condition (c) to Rule LR R7 exacerbates all the inequities of the allocation regime as expressed in the rules. As raised in CNIILML's main submission and in further submissions, the allocation regime is not consistent with: - Natural Justice. This is because the group deciding on how to require responses to the need to reduce nitrogen inputs to the lake had no representation by CNIILML at any stage, despite CNIILML being a significant landowner in the catchment (7%). This has resulted in a disparate impact on lwi, due to the very recent return to lwi of Settlement Land. The allocation decision process was by a collaborative group that was not fully representative of the land use of the catchment and has (unsurprisingly) resulted in an allocation regime skewed to the needs and values of those on the group. The allocation decisions were made in a collaborative process between the constituents of the pastoral sector; not the land based primary sector owners. This allocation group (StAG) chose to allocate by sector averaging grand parenting. This approach rewards the polluters and penalises those who have had positive effects in the past through having very low leaching activities or having undertaken previous mitigation measures. High leachers have a wide range of options, low leachers' options are severely constrained. Those presently with dairying land have considerable flexibility of what to do with their property, including use of the incentives scheme. Forestry has none. One factor used for allocation is past committed capital, however this is seen only in the context of pastoral farming committed capital, not forestry. The allocation systems used, and thus expressed through the rules, penalises owners of Maori land for t
Decision Sought:	As above
Panel Recommendation:	Accept in part
Further Submission No:	18 - 1 Submission Type: Other
Further Submitter:	Tapuika lwi Authority
Submission Summary:	Concern over additional nutrient loading from Lake Rotorua on the health of the Kaituna River.
Decision Sought:	As above
Panel Recommendation:	Accept
Further Submission No:	19 - 1 Submission Type: Support in Part

Further Submitter:

Ravensdown Limited

Submission Summary:	While Ravensdown supports the intent of the rule, Ravensdown opposes an input control approach and seeks for condition (c) be amended to delete the reference.			
Decision Sought:	Amend condition (c) to read "There is no increase in effective area, or increase in nitrogen loss from the date of notification"			
Panel Recommendation:	Reject			
Further Submission No:	20 - 1	Submission Type: Oppose		
Further Submitter:	The Fertiliser Association o	f New Zealand		
Submission Summary:	 FANZ oppose the submitter's wording of LR R7 (c): The current wording of the rule will give rise to uncertainty for Plan users, especially in regard to the use of the word 'may' as this cannot be measured. FANZ support output control. 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 for and encourages innovation and flexibility in farming operations, to provide greater efficiencies. 			
Decision Sought:	Amend to: "There is no increase in effe February 2016"	ective area or an increase in nitrogen loss from land from 29		
Panel Recommendation:	Accept in Part			

Section: LR R7(a)

Panel Recommendation

See Section LR R7 above.

Submissions

Submission Number:	43: 64	Submission Type:	Support in Part
Submitter:	Ravensdown Limited		
Submission Summary:		the rule above. Ravensdown or monitoring purposes and no ® nutrient budget should onl	supports the requirement of condition of that the inputs are controlled to see if y be submitted every three years to
Decision Sought:	Amend condition (a) to include the r Schedule LR Three for monitoring p		information in accordance with et to be submitted every three years.
Panel Recommendations:	Accept in Part		

Submission Number:	43: 65	Submission Type:	Support in Part
Submitter:	Ravensdown Limited		
Submission Summary:	The words in (a) "demonstrating that requirement that is already stated in (a)(1) but the focus should just be for they stay the same. An OVERSEER ensure that the nitrogen losses are left	the rule above. Ravensdown monitoring purposes and not nutrient budget should only	supports the requirement of condition t that the inputs are controlled to see if / be submitted every three years to
Decision Sought:		s nitrogen loss is less than 68	d experienced person, demonstrating 3% of the nitrogen loss rate generated
Panel Recommendations:	Accept in Part		
Submission Number:	56: 11	Submission Type:	Support
Submitter:	Bay of Plenty Regional Council		
Submission Summary:	All need to refer to effective area.		
Decision Sought:	Amend wording in LR R7(a) to read ' nitrogen loss is less". The same ar		perty/farming enterprise's effective are .7(a)2.
Panel Recommendations:	Accept in Part		
Submission Number:	58: 10	Submission Type:	Oppose
		21	
Submitter:	Max Douglas		
Submitter: Submission Summary:	Oppose the Use of OVERSEER®	for Compliance. The purpose that. Forcing the use of OVE	is to reduce N pollution. Requiring us RSEER® does increase compliance
	Oppose the Use of OVERSEER® to use OVERSEER® does not do	for Compliance. The purpose that. Forcing the use of OVE h paperwork and consultants ng a stocking allocation and a	is to reduce N pollution. Requiring us RSEER® does increase compliance stocking table that is calibrated by
Submission Summary:	Oppose the Use of OVERSEER® to use OVERSEER® does not do to costs and erode the rural lifestyle wit Change this to a default policy of usin BoPRC inspectors.	for Compliance. The purpose that. Forcing the use of OVE h paperwork and consultants ng a stocking allocation and a	is to reduce N pollution. Requiring us RSEER® does increase compliance stocking table that is calibrated by
Submission Summary: Decision Sought: Panel Recommendations:	Oppose the Use of OVERSEER® to use OVERSEER® does not do costs and erode the rural lifestyle wit Change this to a default policy of usin BoPRC inspectors. Retain the existing text as an option	for Compliance. The purpose that. Forcing the use of OVE h paperwork and consultants ng a stocking allocation and a	is to reduce N pollution. Requiring us RSEER® does increase compliance stocking table that is calibrated by
Submission Summary: Decision Sought: Panel Recommendations: Submission Number:	Oppose the Use of OVERSEER® to use OVERSEER® does not do t costs and erode the rural lifestyle wit Change this to a default policy of usin BoPRC inspectors. Retain the existing text as an option Reject	for Compliance. The purpose that. Forcing the use of OVE h paperwork and consultants ng a stocking allocation and a land owners may choose to	is to reduce N pollution. Requiring us RSEER® does increase compliance stocking table that is calibrated by engage.
Submission Summary: Decision Sought:	Oppose the Use of OVERSEER® to use OVERSEER® does not do to costs and erode the rural lifestyle wit Change this to a default policy of usin BoPRC inspectors. Retain the existing text as an option Reject 58: 17 Max Douglas	for Compliance. The purpose that. Forcing the use of OVE h paperwork and consultants ng a stocking allocation and a land owners may choose to a Submission Type:	is to reduce N pollution. Requiring us RSEER® does increase compliance a stocking table that is calibrated by engage.
Submission Summary: Decision Sought: Panel Recommendations: Submission Number: Submitter:	Oppose the Use of OVERSEER® to use OVERSEER® does not do costs and erode the rural lifestyle wit Change this to a default policy of usin BoPRC inspectors. Retain the existing text as an option Reject 58: 17 Max Douglas At the intensity given, there is a net g	for Compliance. The purpose that. Forcing the use of OVE h paperwork and consultants ng a stocking allocation and a land owners may choose to a Submission Type: gain for the lake with NDA not	is to reduce N pollution. Requiring us RSEER® does increase compliance a stocking table that is calibrated by engage. Oppose being used. It could be sold or traded, operations, have BoPRC

Panel Recommendation

See Section LR R7 above.

Submissions

Submission Number:	56: 10	Submission Type:	Support
Submitter:	Bay of Plenty Regional Council		
Submission Summary:	There is inconsistency with the terminology used throughout the rule.		
Decision Sought:	Amend wording in LR R7(a) to read "demonstrating that the property/farming enterprise's effective a nitrogen loss is less". The same amendment is needed in LR R7(a)2.		

Panel Recommendations:	Accept in Par	t				
Submission Number:	58: 18	Submission Type: Oppose in Part				
Submitter:	Max Douglas					
Submission Summary:		ert a heritage farming operation to the list of 2017 permitted activities where land owners adopt nificantly reduced NDA.				
Decision Sought:	Insert a herita significantly re	ge farming operation to the list of 2017 permitted activities where land owners adopt educed NDA.				
Panel Recommendations:	Reject					
Submission Number:	70: 71	Submission Type: Oppose				
Submitter:	The Fertiliser Association of New Zealand					
Submission Summary:	OVERSEER® Economically using annual	VVERSEER® File requested in LR R7(a) will take into account nitrogen inputs and outputs. SEER® provides estimates of long term, annual average farm system inputs and outputs. omically viable farm systems require flexibility. It is entirely inappropriate to require annual estimates annual data locking in farm inputs. It is appropriate to review the farm system annually to ensure has been no significant farm system change. Therefore (a)(1) requires amending accordingly.				
Decision Sought:	each year, wi	(a)(1)Nutrient management plans must be reviewed on an annual basis, by 31 October the records kept to confirm that there has been no significant farm system change and that be find from (a) remains representative of the farm system.				
Panel Recommendations:	Accept in Par	t				
Further Submission(s)						
Further Submiss	ion No:	12 - 24 Submission Type: Support				
Further Submitte	er:	Federated Farmers of New Zealand				
Submission Sum	nmary:	For the reasons given in the original submission.				
Decision Sought	:	As above				
Panel Recomme	endation:	Reject				

1090 Section: LR R7(a)2 **Panel Recommendation** See Section LR R7 above. **Submissions** Submission Number: 43: 66 Submission Type: Oppose Submitter: Ravensdown Limited Submission Summary: Condition (a)(2) makes no sense. 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. Decision Sought: Delete Condition (a) (2). Panel Recommendations: Reject Submission Number: 58: 19 Submission Type: Oppose in Part Submitter: Max Douglas Submission Summary: Insertion of a heritage farming operation to the list of 2017 permitted activities where land owners adopt significantly reduced NDA. Insertion of a heritage farming operation to the list of 2017 permitted activities where land owners adopt **Decision Sought:** significantly reduced NDA. Panel Recommendations: Reject

Section: LR R7(b)

Panel Recommendation

See Section LR R7 above.

Submissions

Submission Number:	43: 67	Submission Type:	Oppose
Submitter:	Ravensdown Limited		
Submission Summary:	Condition (b) should be deleted and the tr	ansfer of nitrogen loss e	entitlement should be provided for as a
Decision Sought:	discretionary activity until 2022. Delete condition (b).		
Panel Recommendations:	Reject		
Submission Number:	49: 71	Submission Type:	Oppose
Submitter:	CNI Iwi Land Management Ltd		
Submission Summary:	It is not clear why this land use should be which has been allocated to a different lar should allow for the most efficient exchange	nd holder. The redistribu	
Decision Sought:	Delete.		
Panel Recommendations:	Reject		
Submission Number:	70: 73	Submission Type:	Oppose
Submitter:	Ravensdown Limited		
Submission Summary:	LR R7(b) if the transfer of nitrogen loss er should be provided for as a permitted acti		ained by administrative efficiency it

Decision Sought: LR R7(b) if the transfer of nitrogen loss entitlements is not constrained by administrative efficiency it should be provided for as a permitted activity after 2022.

Panel Recommendations: Reject

Section: Advice note 1

Panel Recommendation

See Section LR R7 above.

Submissions

Submission Number:	56: 13	Submission Type: Support	
Submitter:	Bay of Plenty Regional Council		
Submission Summary:	Correction required to better describe the Permitted Activity level in 6.2.0.		
Decision Sought:	Amend wording to "1. Under OVERSEER® version of 18 kg N/ha/yr which is equivalent to 71% of the d		

Panel Recommendations: Accept in Part

Further Submission(s)

	Further Submission No: Further Submitter: Submission Summary: Decision Sought:		8 - 28	Submission Typ	be: Oppose
			Lake Rotorua Primary Producers Collective The Collective oppose the methodology of Reference files. You cannot hold a land owner to achieving a single NDA figure when you are manipulating figures to averages and bugs in new OVERSEER® versions require changes to percentage figures.		
			As above		
	Panel Recomme	endation:	Reject		
Submiss	ion Number:	70: 72		Submission Type:	Oppose
Submitte	er:	The Fertilise	er Association of New Zea	land	
		5		ed that specifying an OVERSEER® ns of OVERSEER® will not be	
Decision Sought: Delete the A		dvice Note for LR R7.			
Panel Recommendations:		Accept			

Section: LRR8 Farm activity under 40ha effective area or not previously managed by Rule 11

Panel Recommendation

Refer to the body of our report for our recommendation on this section.

Submissions

Submission Number:	7: 2	Submission Type:	Oppose
Submitter:	John de Jong		
Submission Summary:	I am a small land owner of 13ha and lease owners of these blocks will require consen yearling bulls per hectare. The proposed c would make it uneconomical to farm.	ts after 2022 under LRR	8. To be profitable I need to run 2.5
Decision Sought:	Not specified.		
Panel Recommendations:	Reject		

Submission Nun	nber:	33: 7	Submission Type: Oppose
Submitter:		Utuhina Valle	ey Farm
Submission Sun	nmary:		rming is extremely cost sensitive, thus any compliance costs with negligible benefits would ditional burden on our already low cost farming system.
Decision Sought	t:	Farming sho	uld be a permitted activity not controlled.
Panel Recomme	endations:	Reject	
Submission Nun	nber:	43: 68	Submission Type: Support in Part
Submitter:		Ravensdown	n Limited
Submission Sun	nmary:	Support the a non-notified	controlled activity status of the rule, and the intention to consider any consent application on d basis.
Decision Sought	::	Retain the connon-notified	ontrolled activity status of the rule, and the intention to consider any consent application on a basis.
Panel Recomme	endations:	Accept	
Further Subm	ission(s)		
	r Submissio r Submitter		15 - 22 Submission Type: Support Ballance Agri-Nutrients Limited
Subm	ission Surr	imary:	The activity status provides some certainty for those with smaller properties, who wish to undertake farming activities and comply with the conditions of LRR8.
Decis	ion Sought	:	As above
Panel	Recomme	endation:	Accept
Submission Nun	nber:	43: 69	Submission Type: Support in Part
Submitter:		Ravensdown	n Limited
Submission Sun	nmary:		Rule LR R8 is confusing and needs to be amended to apply to either less than 40 hectares or eviously managed by Rule 11-11F, where either do not meet the permitted activity conditions
Decision Sought	Ľ	properties/fa	itle of the rule to read (or similar): "The use of land for farming activities either on Irming enterprises less than 40 hectares in effective area, or that were not previously Rule 11 to 11F, that where neither do not meet permitted activity conditions".
Panel Recomme	endations:	Accept in Pa	art
Further Subm	ission(s)		
Furthe	er Submiss	ion No:	15 - 23 Submission Type: Support in Part
Furthe	er Submitte	r:	Ballance Agri-Nutrients Limited
	ission Surr	imary:	As notified the title is unnecessarily lengthy. However Ballance considers the title of the rule, as proposed by Ravensdown, could be further improved to provide greater clarity.
Subm			
	ion Sought	:	Not specified.
Decis	ion Sought Recomme		
Decis Panel	Recomme		Not specified.
Decis	Recomme	endation:	Not specified. Accept in Part Submission Type: Support in Part
Decisi Panel Submission Nun	nber:	43: 75 Ravensdown As part of red	Not specified. Accept in Part Submission Type: Support in Part
Decisi Panel Submission Nun Submitter:	nber:	43: 75 Ravensdown As part of rec that is valid fo	Not specified. Accept in Part Submission Type: Support in Part n Limited quiring a Nutrient Management Plan, Council should require a Nutrient Budget be prepared for 3 years, unless there is a significant farm change. uld require a Nutrient Budget be prepared that is valid for 3 years, unless there is a significant

Further Submiss	ion No:	15 - 26 Submission Type: Support
Further Submitte		Ballance Agri-Nutrients Limited
Submission Sur		Preparation of a nutrient budget is in keeping with the Nutrient Management Plan
Decision Sought		approach. As above
Panel Recomme		Reject
Submission Number:	49: 72	Submission Type: Support in Part
Submitter:	CNI Iwi Land	I Management Ltd
Submission Summary:	There is no clear link for requiring a review clause or a review of the consent that is associated we output effects. This is necessary in case the type and level of response that the consent allows be seriously out of kilter with the requirements for meeting the lake water quality limits.	
Decision Sought:	Add to matte	ers that control is reserved over (v) changes to lake water quality limits or words to like effect
Panel Recommendations:	Accept in Pa	art
Submission Number:	56: 14	Submission Type: Support
Submitter:	Bay of Plenty	y Regional Council
Submission Summary: The second I		bullet point is missing any reference to permitted activity rules.
Decision Sought:	Amend the second bullet point to read: "The activity does not comply with permitted activity condition the use of land for farming activities".	
Panel Recommendations:	Accept	
Submission Number:	56: 19	Submission Type: Support
Submitter:	Bay of Plenty	y Regional Council
Submission Summary:	The assessn	nent criteria do not link to Policy LR P16 by providing the ability to consider consent duration
Decision Sought:		ional matter of control under LRR8, LRR9, LRR10, LRR11 ' The duration of the consent to ature, scale and robustness of any on farm mitigation options proposed.
Panel Recommendations:	Accept	
Submission Number:	61: 9	Submission Type: Oppose
Submitter:	Beef + Lamb	New Zealand
counterintuitive to achieving acti prioritised actions. Acknowledge		rrent approach to on farm management through potentially prescriptive farm plans is ive to achieving action at a sub catchment level, through coordinated, well supported and stions. Acknowledgement needs to be given to a whole farm approach to managing the pacts on water quality, not just limited to Nitrogen.
Decision Sought:	Delete any reference to prescriptive input-based management; and accordingly, remove all refere the rules to prescriptive management of farm plans. They should not be used as a method by whic councils aim to prescribe and or manage farm activities.	
Panel Recommendations:	Reject	
Further Submission(s)		
Further Submiss	ion No:	11 - 4 Submission Type: Support
Further Submitte	er:	Deer Industry New Zealand
Submission Sur	nmary:	Supports the removal of any input-based prescriptive management from the rules and all references in the rules to prescriptive management of farm plans until at least the completion of the science review DINZ considers the submitters' requests are consistent

with an over-arching Accord approach.

completion of the science review. DINZ considers the submitters' requests are consistent

	Decision Sought:		As above		
	Panel Recomm	endation:	Reject		
	Further Submission No: Further Submitter:		12 - 25 Submission Type: Support		
			Federated Farmers of New Zealand		
	Submission Sur	nmary:	For the reasons given in the original submission.		
	Decision Sought: Panel Recommendation:		As above		
			Reject		
Submiss	sion Number:	64: 2	Submission Type: Support in Part		
Submitter: DairyNZ and		DairyNZ an	d Fonterra Co-operative Group Limited		
catchment s However, du the lake to a		catchment s However, d the lake to a	d Fonterra support the proposal that all dairy farms in the Rotorua Lake surface water should be required to meet their 2022 Nitrogen Discharge Allowance. ue to the uncertainty around what the long-term sustainable nitrogen and phosphorus loads to achieve and maintain a TLI target of 4.2 should be we recommend that the PC 10 should be include new Permitted Rules.		
 modified to include new Permitted Rules. Decision Sought: The Plan should provide for a Permitted Activity rule as follows: Permitted – from 1 J June 2022, The use of land for farming activities on properties/farming enterprises that are 40 he effective area The use of land for farming activities on properties/farming enterprises in the Lake Rot catchment where: The property/farming enterprise is 40 hectares or more in effective area is a permitted June 2022 subject to the following conditions: (a) A 2032 Nitrogen Discharge Allowance and relevant Managed Reduction Targets he determined for the land in accordance with Schedule LR One and Policy LR P8; and (b) A Nitrogen Management Plan has been prepared for the property/farming enterprise qualified and experienced person and that person has certified that the Nitrogen Managemate in accordance with Schedule LR Six. (c) Regional Council approval of the 2032 Nitrogen Discharge Allowance and Policy LR P8. (d) The submission of an annual OVERSEER® file prepared by a suitably qualified are person, demonstrating that on a 3 year rolling output average basis the property is on consistent with meeting the 2022 MRT. (e) Provision of information and documentation to support the OVERSEER® file, incluand protocols. (f) Implementation of the Nitrogen Management Plan, or actions that will have an equival loss benefit as calculated / modelled through OVERSEER* being used as set out in c so as to meet the Managed Reduction Target 		f land for farming activities on properties/farming enterprises that are 40 hectares or more in ea land for farming activities on properties/farming enterprises in the Lake Rotorua groundwater where: ty/farming enterprise is 40 hectares or more in effective area is a permitted activity until 30 subject to the following conditions: Nitrogen Discharge Allowance and relevant Managed Reduction Targets have been for the land in accordance with Schedule LR One and Policy LR P8; and len Management Plan has been prepared for the property/farming enterprise by a suitably d experienced person and that person has certified that the Nitrogen Management Plan has red in accordance with Schedule LR Six. Il Council approval of the 2032 Nitrogen Discharge Allowance and Managed Reduction the land set in accordance with Schedule LR One and Policy LR P8. mission of an annual OVERSEER® file prepared by a suitably qualified and experienced nonstrating that on a 3 year rolling output average basis the property is on a trajectory with meeting the 2022 MRT. n of information and documentation to support the OVERSEER® file, including data inputs ols. ntation of the Nitrogen Management Plan, or actions that will have an equivalent or greater N as calculated / modelled through OVERSEER* being used as set out in condition (b) above, eet the Managed Reduction Target nitoring, record keeping, information provision and site access requirements to demonstrate			
Further	Submission(s	Reject			
	Further Submiss	-	12 - 51 Submission Type: Support in Part		
	Further Submitt		Federated Farmers of New Zealand		
			Support that provision be made for permitted activity status for properties >40ha through		
Submission Summary:		iciy.	to 2022. Oppose the 2032 Nitrogen Discharge Allowance and the proposal that all dairy farms in the Rotorua Lake Surface water catchment should be required to meet their 2022 Nitrogen Discharge Allowance and on that basis we oppose the new permitted rules as drafted by Dairy NZ and Fonterra.		
	Decision Sough	t:	As above		

Submitter:	Peter Reed			
Submission Summary:	As it currently reads "The activity does not comply with permitted activity conditions in Part LR," does not specifically state LR R3.			
Decision Sought:	Should specifically state the rule does not apply to properties that are permitted under LR R3.			
Panel Recommendations:	Accept in Part			
Submission Number:	78: 4 Submission Type: Oppose			
Submitter:	Tony and Joanna Carr			
Submission Summary:	We support that all farmers should engage in this process, but with their industry representative body. To have them attached to Consents takes away all possible innovation that adaptive farm management allows.			
Decision Sought:	Farm Nutrient Plans must sit outside the regulatory process.			
Panel Recommendations:	Reject			
Section: LR R8(a)	1093			

Panel Recommendation

See Section LR R8 above.

Submissions

Submission Number:	45: 3	Submission Type:	Oppose
Submitter:	Wendy and John Roe		
Submission Summary:	I do not support the nitrogen dischar nitrogen loss by way of regulation.	ge allowance process and the	e requirement that land owners reduce
Decision Sought:	Not specified.		
Panel Recommendations:	Reject		
Submission Number:	70: 10	Submission Type:	Oppose
Submitter:	The Fertiliser Association of New Ze	ealand	
Submission Summary:	It should be recognised that econom Allowance are unlikely to be availabl Proposed Plan Change how Council through step wise adaptive manager required as a condition of controlled	le from the outset. It is not cle I will be able to provide any fle ment, if the pathway to achiev	ar under the current wording of the exibility for any viable farming activity
Decision Sought:	Not specified.		
Panel Recommendations:	Reject		
Section: LR R8(b)			

Panel Recommendation

See Section LR R8 above.

Submissions

Submission Number:	16: 8	Submission Type:	Oppose
Submitter:	Neil Heather		
Submission Summary:	That Council confirm its rejection of in the rules to prescriptive managem		agement and remove all references

Decision Sought:		onfirm its rejection of p prescriptive manageme		agement and remove all references
Panel Recommendations:	Reject			
Submission Number:	20: 7		Submission Type:	Oppose
Submitter:	Peter McLean	and Michelle Rennie		
Submission Summary:	l do not suppo a compliance		and owners to complete farm	management plans that will be part of
Decision Sought:	Not specified.			
Panel Recommendations:	Reject			
Submission Number:	23: 9		Submission Type:	Oppose
Submitter:	Roger and No	rreen Martin		
Submission Summary:			and owners to completed farm	m management plans. It was never
Decision Sought:	Not specified			
Panel Recommendations:	Reject			
Submission Number:	24: 5		Submission Type:	Oppose
Submitter:	JT & SA Butte	rworth		
Submission Summary:	measure differ compliance reg with our adviso	ent mitigation solutions gime. A farm managem ors. All that is required nutrient budget which	They must not be part of an eent plan needs to be a living for assessment of the output	be a tool to help a farmer plan and ny regulatory process nor the document that is visited regulatory of nutrients from a property is the basis with our Ballance fertiliser
Decision Sought:	Farm manage	ment plans must not b	e part of any regulatory proc	ess nor the compliance regime.
Panel Recommendations:	Reject			
Submission Number:	39: 5		Submission Type:	Support
Submitter:	Eileen Campb	ell		
Submission Summary:				management plans that will be part of a one's self to actions up to 15 years in
Decision Sought:	Not specified.			
Panel Recommendations:	Reject			
Submission Number:	43: 70		Submission Type:	Support in Part
Submitter:	Ravensdown I	_imited		
Submission Summary:	Condition (b)	should be amended ref	er to a Nutrient Managemer	nt Plan.
Decision Sought:	Refer to a Nut	rient Management Plan	in condition (b).	
Panel Recommendations:	Accept			
Further Submission(s)				
Further Submiss	ion No:	15 - 8	Submission Typ	pe: Support
Further Submitte	er:	Ballance Agri-Nutrient	s Limited	
Submission Sum	imary:			nt Management Plan" is consistent with w Zealand, including but not limited to

Canterbury, Waikato and Southland. The use of "Nutrient Management Plan" rather than "Nitrogen Management Plan" better reflects the intent of the Plan, which isn't limited to managing nitrogen as evidenced by Schedule LR6 within PPC 10. Decision Sought: As above Panel Recommendation: Accept Submission Number: 45:9 Submission Type: Oppose Submitter: Wendy and John Roe Submission Summary: I do not support the requirement for land owners to complete farm management plans that will be part of a compliance process. It is impossible to develop a plan committing ourselves to actions up to 15 years in the future. Decision Sought: Not specified. Panel Recommendations: Reject Submission Number: 48: 17 Submission Type: Oppose Submitter: Parekarangi Trust Submission Summary: Amend this rule to require NDA plans to achieve best farming practice for each 5 year target. Decision Sought: Amend this rule to require NDA plans to achieve best farming practice for each 5 year target. Panel Recommendations: Reject Submission Number: 66: 12 Submission Type: Oppose Submitter: Lake Rotorua Primary Producers Collective Submission Summary: Farm management plans should be a tool to help a farmer plan and measure different mitigation solutions. They must not be part of any regulatory process nor the compliance regime. A farm management plan needs to be a living document that is visited regularly with our advisors. All that is required for assessment of the output of nutrients from a property is the OVERSEER® nutrient budget most farmers complete with their preferred fertiliser company or farm advisor. Decision Sought: That farm plans sit outside all regulatory measures and are used as a living planning tool. Panel Recommendations: Reject Further Submission(s) Further Submission No: 12 - 26 Submission Type: Support Further Submitter: Federated Farmers of New Zealand Submission Summary: For the reasons given in the original submission. Decision Sought: As above Panel Recommendation: Reject Submission Number: 67:7 Submission Type: Oppose Submitter: Karl Weaver I do not support the requirement for landowners to complete farm management plans that will be part of a Submission Summary: compliance process. It is impossible to develop a plan committing oneself to actions up to 15 years in the future. Decision Sought: Not specified. Panel Recommendations: Reject

Submission Number:	70: 76	Submission Type:	Oppose
Submitter:	The Fertiliser Association of New Zealar		
Submission Summary:	Many farms may find it difficult to meet th (5)(a)(ii). The discharge of nutrients from activity because the pathway and mitigat Discharge Allowance are not likely to be	many farms is at risk of ions to achieve the Mana	requiring consent as a non-complying aged Reductions and 2032 Nitrogen
	It is not clear how the Proposed Plan Char gradual land use change if during the first from the outset.		
	Whilst Managed Reduction Targets and years, this should not necessarily require reviewing the relevant conditions of a 20	e consents with a 5 year	
Decision Sought:	Not specified.		
Panel Recommendations:	Reject in part		
Submission Number:	82: 8	Submission Type:	Oppose
Submitter:	Stuart Morrison		
Submission Summary:	I strongly oppose the use of Nitrogen Ma inputs is against all discussions and agre living documents. There use should be a farm within the set environmental constra OVERSEER®, should be the measure a	eements made at stakeho s supporting evidence of aints. Outputs, that is nut	older meetings. Plans by their nature are intentions for continuing to meet and rient discharges such as determined by
Decision Sought:	Change the relevant policies and rules in	cluding LR P8, LR P11,	LR R9 and Schedule 6.
Panel Recommendations:	Reject		

Section: Matter of Control (ii)

Panel Recommendation

See Section LR R8 above

Submissions

Submission Number:	43: 73	Submission Type:	Oppose in Part
Submitter:	Ravensdown Limited		
Submission Summary:	Matters of control (ii) should be deleted, or which shows that the agreed targets are		o the requirement of a nutrient budget
Decision Sought:	Delete matters of control (ii), or if retained that the agreed targets are being met.	d, be limited to the requir	ement of a nutrient budget which shows

Panel Recommendations: Accept in Part

Further Submission No:	15 - 24	Submission Type:	Support
Further Submitter:	Ballance Agri-Nutrien	ts Limited	
Submission Summary:	Ballance considers th restrictive.	ne annual submission of such files t	o be costly and unnecessari
Decision Sought:	Delete clause or ame three years.	nd to allow for the submission of ar	n OVERSEER® file every
Panel Recommendation:	Accept in Part		

Submitter:	Max Douglas		
Submission Summary:	Oppose the Use of OVERSEER® for Compliance. The purpose is to reduce N pollution. Requiring us to use OVERSEER® does not do that. Forcing the use of OVERSEER® does increase compliance costs and erode the rural lifestyle with paperwork and consultants.		
Decision Sought:	Delete.		
Panel Recommendations:	Reject		
Submission Number:	70: 74	Submission Type:	Oppose
Submitter:	The Fertiliser Association of N	ew Zealand	
Submission Summary:	model and so the OVERSEER	® nutrient budget should be valid f e. Under Bullet (ii) the OVERSEER	odel is a long term annual average for at least 3 years unless there is a Nutrient Budget file should be
Decision Sought:		: The submission of an OVERSEEF n is consistent with the Nutrient Man	R® file, prepared by a suitably qualified nagement Plan.

Panel Recommendation

See Section LR R8 above.

Submissions

Submissi	ion Number:	43: 74		Submission Type:	Oppose in Part
Submitte	r:	Ravensdown	Limited		
Submissi	ion Summary:	Matters of co	ntrol (iii) does not seer	n to be necessary.	
Decision	Sought:	Delete matte	rs of control (iii).		
Panel Re	ecommendations:	Accept in par	t		
Further	Submission(s)				
	Further Submissi	ion No:	15 - 25	Submission Ty	pe: Support
	Further Submitte	er:	Ballance Agri-Nutrie	nts Limited	
	Submission Sum	nmary:		hat it is inappropriate to requir estions the relevance of the cl	e the written approval of a third party ause.
	Decision Sought	:	As above		
	Panel Recomme	endation:	Accept in part		
Submissi	ion Number:	70: 75		Submission Type:	Oppose
Submitte	r:	The Fertiliser	Association of New Z	Zealand	
Submissi	ion Summary:	It is not unde	rstood why bullet (iii) i	s necessary.	
Decision	Sought:	Delete.			
	ecommendations:	Accept in par	-+		

Section: Matter of Control (iv)

Panel Recommendation

See Section LR R8 above.

Submissions

Submission Number:	58: 12	Submission Type:	Oppose
Submitter:	Max Douglas		
Submission Summary:	Oppose the Use of OVERSEER® for Co to use OVERSEER® does not do that. I costs and erode the rural lifestyle with pap	Forcing the use of OVE	RSEER® does increase compliance
Decision Sought:	Delete.		
Panel Recommendations:	Reject		

Section: Matter of Control (v)

Panel Recommendation

See Section LR R8 above.

Submissions

Submission Number:	43: 71	Submission Type:	Support in Part
Submitter:	Ravensdown Limited		
Submission Summary:	Matters of control (v) should be amended i	refer to a Nutrient Mana	gement Plan.
Decision Sought:	Refer to a Nutrient Management Plan in m	atters of control (v).	
Panel Recommendations:	Accept		

Further Submission(s))			
Further Submiss	sion No:	15 - 9	Submission Type:	Support
Further Submitte	er:	Ballance Agri-Nutrie	ents Limited	
Submission Sur	mmary:	terminology being u Canterbury, Waikato The use of "Nutrient	sed in other regions around New Z o and Southland. Management Plan" rather than "N the Plan, which isn't limited to ma	Anagement Plan" is consistent with Zealand, including but not limited to Nitrogen Management Plan" better naging nitrogen as evidenced by
Decision Sough	t:	As above		
Panel Recomm	endation:	Accept		
Submission Number:	56: 15		Submission Type: S	Support
Submitter:	Bay of Pler	ty Regional Council		
Submission Summary:		00	ate the review of a approved conse entives Board or transferred.	ent and its associated NDA/NMP
Decision Sought:		Circumstances that may	natters that Council reserves contr require a review of a Nitrogen Dis	ol over for LR R8 to 10(v) and LR charge Allowance or a Nitrogen
Panel Recommendations:	Accept			
Section: Matter of	Control (vi)			109

Section: Matter of Control (vi)

Panel Recommendation

See Section on LR R8 above.

Submissions

43: 72	Submission Type: S	Support in Part
Ravensdown Limited		
Matters of control (vi) should be a	mended refer to a Nutrient Manag	ement Plan.
Refer to a Nutrient Management P	Plan in matters of control (vi).	
Accept		
on No: 15 - 10	Submission Type:	Support
r: Ballance Agri-Nutri	ents Limited	
terminology being u Canterbury, Waikat The use of "Nutrien reflects the intent o	used in other regions around New Z to and Southland. ht Management Plan" rather than "N f the Plan, which isn't limited to ma	Zealand, including but not limited to litrogen Management Plan" better
As above		
ndation: Accept		
	Ravensdown Limited Matters of control (vi) should be a Refer to a Nutrient Management F Accept on No: 15 - 10 r: Ballance Agri-Nutri mary: Ballance considers terminology being to Canterbury, Waika The use of "Nutrier reflects the intent of Schedule LR6 with As above	Ravensdown Limited Matters of control (vi) should be amended refer to a Nutrient Manager Refer to a Nutrient Management Plan in matters of control (vi). Accept on No: 15 - 10 Submission Type: r: Ballance Agri-Nutrients Limited mary: Ballance considers that the use of the term "Nutrient Management Plan" rather than "N terminology being used in other regions around New Z Canterbury, Waikato and Southland. The use of "Nutrient Management Plan" rather than "N reflects the intent of the Plan, which isn't limited to ma Schedule LR6 within PPC 10. As above

Section: LRR9 From 1/07/2017 farm activity 40 hectares plus in effective area

Panel Recommendation

Refer to the body of our report for our recommendation on this section.

Submissions

Submission Number:	32: 13	Submission Type:	Oppose
Submitter:	Kaitao Rotohokahoka 2D Trust		
Submission Summary:	The Trust requests a longer timeframe f modelling before setting the allocation n consents in concrete.	U	
Decision Sought:	Extend the timeframe to set rules, meet reductions.	nitrogen reduction target	s and measure progress towards
Panel Recommendations:	Reject		
Submission Number:	33: 8	Submission Type:	Oppose
Submitter:	Utuhina Valley Farm		
Submission Summary:	Drystock farming is extremely cost sens would place an additional burden on our	, , ,	00
Decision Sought:	Farming should be a permitted activity r	ot controlled.	
Panel Recommendations:	Reject		
Submission Number:	48: 27	Submission Type:	Oppose
Submitter:	Parekarangi Trust		
Submission Summary:	There is no point to reducing NDA targe	ts below 2017 if TLI for L	R continues to average 4.2.
Decision Sought:	This rule is linked to TLI. If TLI continue	s to average 4.2 or less t	hen targets are removed.
Panel Recommendations:	Reject		

Submission Summary: The assessment criteria do not link to Policy LR P16 by providing the ability to consider consent dur Decision Sought: Add an additional matter of control under LRR8, LRR9, LRR10, LRR11 ' The duration of the consen reflect the nature, scale and robustness of any on farm mitigation options proposed. Panel Recommendations: Accept Submission Number: 64: 3 Submission Summary: DairyNZ and Fonterra Co-operative Group Limited Submission Summary: DairyNZ and Fonterra support the proposal that all dairy farms in the Rotorua Lake surface water catchment should be required to meet their 2022 Nitrogen Discharge Allowance. However, due to the uncertainty around what the long-term sustainable nitrogen and phosphorus load the lake to achieve and maintain a TLI target of 4.2 should be we recommend that the PC 10 should modified to include new Permitted and Controlled Activity Rules.	Submission Number:	49: 73	Submission Type:	Support in Part
output effects. This is necessary in case the type and level of response that the consent allows becomparison seriously out of kilter with the requirements for meeting the lake water quality limits. Decision Sought: Add to matters that control is reserved over (v) changes to lake water quality limits or words to like effects. This is necessary in case the type and level of response that the consent allows becomparison. Submission Number: 56: 20 Submission Type: Support Submission Summary: Bay of Plenty Regional Council Submission Summary: Add an additional matter of control under LR8, LR89, LRR10, LRR11 ' The duration of the consent reflect the nature, scale and robustness of any on farm mitigation options proposed. Panel Recommendations: Accept Submission Type: Support in Part Submission Number: 64: 3 Submission Type: Support in Part Submission Summary: DairyNZ and Fonterra Support the proposal that all dairy farms in the Rotorua Lake surface water catchment should be required to meet their 2022 Nitrogen Discharge Allowance. Beviewer, due to the uncertainty around what the long-term sustainable nitrogen and phosphorus loa the lake to achieve and maintan a TLI target of 4.2 should be we recommend that the PC 10 should modified to include new Permitted activities on properties/farming enterprises that do not meet permitted activity conditions, (including all farming properties/farming enterprises that do not meet permitted activity conditions, (including alifarming properties/farming enterprises that do not m	Submitter:	CNI lwi Land Management Ltd		
Panel Recommendations: Accept in Part Submission Number: 56: 20 Submission Type: Support Submission Summary: The assessment criteria do not link to Policy LR P16 by providing the ability to consider consent dur Decision Sought: Add an additional matter of control under LRR8, LRR9, LRR10, LRR11 'The duration of the consent effect the nature, scale and robustness of any on farm mitigation options proposed. Panel Recommendations: Accept Submission Number: 64: 3 Submission Summary: DairyNZ and Fonterra Co-operative Group Limited Submission Summary: DairyNZ and Fonterra Co-operative Group Limited Submission Summary: DairyNZ and Fonterra Co-operative Group Limited Submission Summary: DairyNZ and Fonterra Support the proposal that all dairy farms in the Rotorua Lake surface water catchment should be required to meet their 2022 Nitrogen Discharge Allowance. However, due to the uncertainty around what the long-term sustainable nitrogen and phosphorus loa the lake to activities on and properties/farming enterprises that do not meet permitted activity conditions, (including all farming properties/farming enterprises that do not meet permitted activity conditions, (including all farming properties/farming enterprises that do not meet the following conditions: Controlled - The use of land for farming activities on properties/farming enterprises that do not meet the following conditions: (a) A 2032 Nitrogen Discharge Allowance and relevant Managed Red	Submission Summary:	output effects. This is necessary in case the	e type and level of resp	ponse that the consent allows becomes
Submission Number: 56: 20 Submission Type: Support Submission Summary: The assessment criteria do not link to Policy LR P16 by providing the ability to consider consent dur Decision Sought: Add an additional matter of control under LRR8, LRR9, LRR10, LRR11' The duration of the consen reflect the nature, scale and robustness of any on farm mitigation options proposed. Panel Recommendations: Accept Submission Number: 64: 3 Submission Summary: DairyNZ and Fonterra Co-operative Group Limited Submission Summary: DairyNZ and Fonterra support the proposal that all dairy farms in the Rotorua Lake surface water catchment should be required to meet their 2022 Nitrogen Discharge Allowance. However, due to the uncertainty around what the long-term sustainable nitrogen and phosphorus loa the lake to achieve and maintain a TLI target of 4.2 should be we recommend that the PC 10 should modified to include new Permitted and Controlled Activity Rules. Decision Sought: A new Controlled Activity as follows: Controlled – The use of land for farming activities on properties/farming enterprises that do not meet permitted activity conditions, (including all farming properties/farming enterprises that do not meet catchment where: - The activity does not comply with permitted activity conditions in Part LR, is a controlled activity sub to the following conditions: (a) A 2032 Nitrogen Discharge Allowance and relevant Managed Reduction Targets have been determined for the land in accordance with Schedule LR One and Policy LR P8; and (b) A Nitrogen Management Plan has been prepared for the property/farming enterprise by a suit	Decision Sought:	Add to matters that control is reserved over	(v) changes to lake w	rater quality limits or words to like effect
Submitter: Bay of Plenty Regional Council Submission Summary: The assessment criteria do not link to Policy LR P16 by providing the ability to consider consent dur Decision Sought: Add an additional matter of control under LRR8, LRR9, LRR10, LRR11 ' The duration of the consent reflect the nature, scale and robustness of any on farm mitigation options proposed. Panel Recommendations: Accept Submission Number: 64: 3 Submission Summary: DairyNZ and Fonterra Co-operative Group Limited Submission Summary: DairyNZ and Fonterra support the proposal that all dairy farms in the Rotorua Lake surface water catchment should be required to meet their 2022 Nitrogen Discharge Allowance. However, due to the uncertainty around what the long-term sustainable nitrogen and phosphorus loa the lake to achieve and maintain a TLI target of 4.2 should be we recommend that the PC 10 should modified to include new Permitted and Controlled Activity Rules. Decision Sought: A new Controlled Activity as follows: Controlled - The use of land for farming activities on properties/farming enterprises that do not meet permitted activity does not comply with permitted activity conditions in Part LR, is a controlled activity sub to the following conditions: (a) A 2032 Witrogen Discharge Allowance and Policy LR P8; and (b) A Nitrogen Management Plan has been prepared for the property and Policy LR P8; and (b) A Nitrogen Management Plan has been prepared for the property by a suitably qualified and experienced person and that person has certified that the Nitrogen Management Plan h been prepared in acc	Panel Recommendations:	Accept in Part		
Submission Summary: The assessment criteria do not link to Policy LR P16 by providing the ability to consider consent dur Decision Sought: Add an additional matter of control under LRR8, LRR9, LRR10, LRR11 ' The duration of the consent reflect the nature, scale and robustness of any on farm mitigation options proposed. Panel Recommendations: Accept Submission Number: 64: 3 Submission Summary: DairyNZ and Fonterra Co-operative Group Limited Submission Summary: DairyNZ and Fonterra support the proposal that all dairy farms in the Rotorua Lake surface water catchment should be required to meet their 2022 Nitrogen Discharge Allowance. However, due to the uncertainty around what the long-term sustainable nitrogen and phosphorus loa the lake to achieve and maintian a TLI target of 4.2 should be we recommend that the PC 10 should modified to include new Permitted and Controlled Activity Rules. Decision Sought: A new Controlled Activity as follows: Controlled – The use of land for farming activities on properties/farming enterprises that do not meet permitted activity conditions, (including all farming properties beyond July 2022 not allowed for in Rul LR 2, LR R3, LR R4 and LR R7) The use of land for farming activities on properties/farming enterprises that been determined for the Iand in accordance with Schedule LR One and Policy LR P8; and (b) A Nitrogen Management Plan has been prepared for the property and Policy LR P8; and (b) A Nitrogen Management Plan and secordance with Schedule LR One and Policy LR P8. (a) 2032 Nitrogen Discharge Allowance and Managed Reduction Targets for th	Submission Number:	56: 20	Submission Type:	Support
Decision Sought: Add an additional matter of control under LRR8, LRR10, LRR11, The duration of the consent reflect the nature, scale and robustness of any on farm mitigation options proposed. Panel Recommendations: Accept Submission Number: 64: 3 Submission Summary: DairyNZ and Fonterra Co-operative Group Limited Submission Summary: DairyNZ and Fonterra support the proposal that all dairy farms in the Rotorua Lake surface water catchment should be required to meet their 2022 Nitrogen Discharge Allowance. However, due to the uncertainty around what the long-term sustainable nitrogen and phosphorus loa the lake to achieve and maintain a TL1 target of 4.2 should be we recommend that the PC 10 should modified to include new Permitted and Controlled Activity Rules. Decision Sought: A new Controlled Activity as follows: Controlled - The use of land for farming activities on properties/farming enterprises that do not meet permitted activity conditions, (including all farming properties/farming enterprises that do not meet use to the following conditions; Diving conditions: (a) A 2032 Nitrogen Discharge Allowance and relevant Managed Reduction Targets have been determined for the land in accordance with Schedule LR One and Policy LR P8; and (b) A Nitrogen Management Plan has been prepared for the property/farming enterprise by a suitably qualified and experienced person and that person has certified that the Nitrogen Management Plan h been prepared in accordance with Schedule LR One and Policy LR P8; and (b) A Nitrogen Management Plan has been prepared for the LON one and Policy LR P8; and (b) A Nitrogen Management Plan has been prepared for the property/farming enterprise by a suitabl	Submitter:	Bay of Plenty Regional Council		
reflect the nature, scale and robustness of any on farm mitigation options proposed. Panel Recommendations: Accept Submission Number: 64: 3 Submission Type: Support in Part Submission Summary: DairyNZ and Fonterra Co-operative Group Limited Submission Summary: DairyNZ and Fonterra Support the proposal that all dairy farms in the Rotorua Lake surface water catchment should be required to meet their 2022 Nitrogen Discharge Allowance. However, due to the uncertainty around what the long-term sustainable nitrogen and phosphorus loa the lake to achieve and maintain a TLI target of 4.2 should be we recommend that the PC 10 should modified to include new Permitted and Controlled Activity Rules. Decision Sought: A new Controlled Activity as follows: Controlled - The use of land for farming activities on properties/farming enterprises that do not meet permitted activity conditions, (including all farming properties/farming enterprises in the Lake Rotorua groundwa catchment where: The use of land for farming activities on properties/farming enterprises in the Lake Rotorua groundwa catchment where: The activity conditions: (a) A 2032 Nitrogen Discharge Allowance and relevant Managed Reduction Targets have been determined for the land in accordance with Schedule LR One and Policy LR P8; and (b) A Nitrogen Management Plan has been prepared for the property/farming enterprise by a suitably qualified and experienced person and that person has certified that the Nitrogen Management Plan h been prepared in accordance with Schedule LR One and Policy LR P8. (ii) The submission of an annual OVERSEEER® file, prepared	Submission Summary:	The assessment criteria do not link to Polic	y LR P16 by providing	the ability to consider consent duration
Submission Number: 64: 3 Submission Type: Support in Part Submission Summary: DairyNZ and Fonterra Support the proposal that all dairy farms in the Rotorua Lake surface water catchment should be required to meet their 2022 Nitrogen Discharge Allowance. However, due to the uncertainty around what the long-term sustainable nitrogen and phosphorus load the lake to achieve and maintain a TLI target of 4.2 should be we recommend that the PC 10 should modified to include new Permitted and Controlled Activity Rules. Decision Sought: A new Controlled Activity as follows: Controlled - The use of land for farming activities on properties/farming enterprises that do not meet permitted activity conditions, (including all farming properties beyond July 2022 not allowed for in Rul LR R2, LR R3, LR R4 and LR R7) The use of land for farming activities on properties/farming enterprises in the Lake Rotorua groundwat catchment where: - The activity does not comply with permitted activity conditions in Part LR, is a controlled activity sub to the following conditions: (a) A 2032 Nitrogen Management Plan has been prepared for the property/farming enterprise by a suitably qualified and experienced person and that person has certified that the Nitrogen Management Plan h been prepared in accordance with Schedule LR Six. Bay of Plenty Regional Council reserves control over the following: (i) The approval of the 2032 Nitrogen Discharge Allowance and Managed Reduction Targets for the I subject to the application, set in accordance with Schedule LR One and Policy LR P8. (ii) The submission of an annual OVERSEER® file, prepared by a suitably qualified and experienced perso	Decision Sought:			
Submitter: DairyNZ and Fonterra Co-operative Group Limited Submission Summary: DairyNZ and Fonterra support the proposal that all dairy farms in the Rotorua Lake surface water catchment should be required to meet their 2022 Nitrogen Discharge Allowance. However, due to the uncertainty around what the long-term sustainable nitrogen and phosphorus loa the lake to achieve and maintain a TLI target of 4.2 should be we recommend that the PC 10 should modified to include new Permitted and Controlled Activity Rules. Decision Sought: A new Controlled Activity as follows: Controlled - The use of land for farming activities on properties/farming enterprises that do not meet permitted activity conditions, (including all farming properties beyond July 2022 not allowed for in Rul LR R2, LR R3, LR R4 and LR R7) The use of land for farming activities on properties/farming enterprises in the Lake Rotorua groundwa catchment where: - The activity does not comply with permitted activity conditions in Part LR, is a controlled activity sub to the following conditions: (a) A 2032 Nitrogen Discharge Allowance and relevant Managed Reduction Targets have been determined for the land in accordance with Schedule LR One and Policy LR P8; and (b) A Nitrogen Management Plan has been prepared for the property/farming enterprise by a suitably qualified and experienced person and that person has certified that the Nitrogen Management Plan has been prepared or the following: (i) The approval of the 2032 Nitrogen Discharge Allowance and Managed Reduction Targets for the I subject to the application, set in accordance with Schedule LR One and Policy LR P8. (ii) The approval of the 2032 Nitrogen Discharge Allowance and Managed Reduction Targets for the I subject to the app	Panel Recommendations:	Accept		
Submission Summary: DairyNZ and Fonterra support the proposal that all dairy farms in the Rotorua Lake surface water catchment should be required to meet their 2022 Nitrogen Discharge Allowance. However, due to the uncertainty around what the long-term sustainable nitrogen and phosphorus loa the lake to achieve and maintain a TLI target of 4.2 should be we recommend that the PC 10 should modified to include new Permitted and Controlled Activity Rules. Decision Sought: A new Controlled Activity as follows: Controlled – The use of land for farming activities on properties/farming enterprises that do not meet permitted activity conditions, (including all farming properties beyond July 2022 not allowed for in Rul LR R2, LR R3, LR 4 and LR R7) The use of land for farming activities on properties/farming enterprises in the Lake Rotorua groundwa catchment where: - The activity does not comply with permitted activity conditions in Part LR, is a controlled activity sub to the following conditions: (a) A 2032 Nitrogen Discharge Allowance and relevant Managed Reduction Targets have been determined for the land in accordance with Schedule LR One and Policy LR P8; and (b) A Nitrogen Management Plan has been prepared for the property/farming enterprise by a suitably qualified and experienced person and that person has certified that the Nitrogen Management Plan h been prepared in accordance with Schedule LR Six. Bay of Plenty Regional Council reserves control over the following: (i) The approval of the 2032 Nitrogen Discharge Allowance and Managed Reduction Targets for the I subject to the application, set in accordance with Schedule LR One and Policy LR P8. (ii) The submission of an annual OVERSEER® file, prepared by a suitably qualified and experienced person, demonstrating that on a 3 year rolling output average basis the property is on a trajectory consistent w	Submission Number:	64: 3	Submission Type:	Support in Part
 catchment should be required to meet their 2022 Nitrogen Discharge Allowance. However, due to the uncertainty around what the long-term sustainable nitrogen and phosphorus load the lake to achieve and maintain a TLI target of 4.2 should be we recommend that the PC 10 should modified to include new Permitted and Controlled Activity Rules. Decision Sought: A new Controlled Activity as follows: Controlled – The use of land for farming activities on properties/farming enterprises that do not meet permitted activity conditions, (including all farming properties beyond July 2022 not allowed for in Rul LR R2, LR R3, LR R4 and LR R7) The use of land for farming activities on properties/farming enterprises in the Lake Rotorua groundwas catchment where: The activity does not comply with permitted activity conditions in Part LR, is a controlled activity sub to the following conditions: (a) A 2032 Nitrogen Discharge Allowance and relevant Managed Reduction Targets have been determined for the land in accordance with Schedule LR One and Policy LR P8; and (b) A Nitrogen Management Plan has been prepared for the property/farming enterprise by a suitably qualified and experienced person and that person has certified that the Nitrogen Management Plan h been prepared in accordance with Schedule LR Six. Bay of Plenty Regional Council reserves control over the following: (i) The approval of the 2032 Nitrogen Discharge Allowance and Managed Reduction Targets for the I subject to the application, set in accordance with Schedule LR One and Policy LR P8. (ii) The application, set in accordance with Schedule LR One and Policy LR P8. (ii) The approval of the 2032 Nitrogen Discharge Allowance and Managed Reduction Targets for the I subject to the application, set in accordance with Schedule LR One and Policy LR P8. 	Submitter:	DairyNZ and Fonterra Co-operative Group	Limited	
 Controlled – The use of land for farming activities on properties/farming enterprises that do not meet permitted activity conditions, (including all farming properties beyond July 2022 not allowed for in Rul LR R2, LR R3, LR R4 and LR R7) The use of land for farming activities on properties/farming enterprises in the Lake Rotorua groundwas catchment where: The activity does not comply with permitted activity conditions in Part LR, is a controlled activity sub to the following conditions: (a) A 2032 Nitrogen Discharge Allowance and relevant Managed Reduction Targets have been determined for the land in accordance with Schedule LR One and Policy LR P8; and (b) A Nitrogen Management Plan has been prepared for the property/farming enterprise by a suitably qualified and experienced person and that person has certified that the Nitrogen Management Plan h been prepared in accordance with Schedule LR Six. Bay of Plenty Regional Council reserves control over the following: (i) The approval of the 2032 Nitrogen Discharge Allowance and Managed Reduction Targets for the I subject to the application, set in accordance with Schedule LR One and Policy LR P8. (ii) The submission of an annual OVERSEER® file, prepared by a suitably qualified and experienced person, demonstrating that on a 3 year rolling output average basis the property is on a trajectory consistent with meeting the 2027 MRT. (iv) The form of information and documentation to support the OVERSEER® file including data input and protocols. (v) Circumstances that may require a review of a Nitrogen Management Plan or consent conditions including a change to property size, the sale or disposal of land, permanent removal of Nitrogen 	Submission Summary:	catchment should be required to meet their However, due to the uncertainty around wh the lake to achieve and maintain a TLI targ	2022 Nitrogen Discha at the long-term susta et of 4.2 should be we	rrge Allowance. inable nitrogen and phosphorus loads to
changes and subdivision. (vi) Implementation of the Nitrogen Management Plan, or actions that will have an equivalent or greated being used as set out in clause (ii) about as to meet the Managed Reduction Targets. (vii) Self-monitoring, record keeping, information provision and site access requirements to demonst on-going compliance with the trajectory toward the MRT on a rolling output average basis as calcul from the annual OVERSEER® file monitoring requirement.		Controlled – The use of land for farming ac permitted activity conditions, (including all f LR R2, LR R3, LR R4 and LR R7) The use of land for farming activities on pro- catchment where: - The activity does not comply with permitter to the following conditions: (a) A 2032 Nitrogen Discharge Allowance at determined for the land in accordance with (b) A Nitrogen Management Plan has been qualified and experienced person and that been prepared in accordance with Schedul Bay of Plenty Regional Council reserves co (i) The approval of the 2032 Nitrogen Disch subject to the application, set in accordance (ii) The submission of an annual OVERSEE person, demonstrating that on a 3 year rolli consistent with meeting the 2027 MRT. (iv) The form of information and documenta and protocols. (v) Circumstances that may require a revier including a change to property size, the sal Discharge Allowance from the catchment, of changes and subdivision. (vi) Implementation of the Nitrogen Manag loss benefit as calculated / modelled throu as to meet the Managed Reduction Target (vii) Self-monitoring, record keeping, inform on-going compliance with the trajectory to	arming properties beyond perties/farming enterpheted activity conditions in and relevant Managed Schedule LR One and prepared for the properson has certified the e LR Six. Antrol over the following arge Allowance and M arge file, prepared by ng output average base attion to support the OV w of a Nitrogen Manage or disposal of land, prehanges in lease arran argenent Plan, or actions gh OVERSEER® beings.	a suitably qualified and experienced sis the property is on a trajectory (ERSEER® file including data inputs gement Plan or consent conditions permanent removal of Nitrogen stat will have an equivalent or greater a that will have an equivalent or demonstrate the access requirements to demonstrate
	Panel Recommendations:	Reject		

Submission Number:	82: 15	Submission Type:	Oppose
Submitter:	Stuart Morrison		
Submission Summary:	I oppose controlled activity status	at least until 2022 and seek reli	ef to that effect.
Decision Sought:	I oppose controlled activity status	at least until 2022 and seek reli	ef to that effect.
Panel Recommendations:	Reject		
Section: LR R9(a)			11
Panel Recommendatio	n		
See Section on LR R9 above			
Submissions			
Submission Number:	45: 4	Submission Type:	Oppose
Submitter:	Wendy and John Roe		
Submission Summary:	I do not support the nitrogen disc nitrogen loss by way of regulation	e	e requirement that land owners reduce
Decision Sought:	Not specified.		
Panel Recommendations:	Reject		
Submission Number:	70: 12	Submission Type:	Oppose
Submitter:	The Fertiliser Association of New	Zealand	
Submission Summary:		ng activity through step wise ada	ange how Council will be able to provid ptive management, if the pathway to of controlled resource consent.
Decision Sought:	It should be recognised that econ Allowance are unlikely to be avail		hieve 2032 Nitrogen Discharge
Panel Recommendations	: Reject		
Section: LR R9(b)			11
Panel Recommendatio	n		
See Section on LR R9 above			
Submissions			
Submission Number	16 [.] 9	Submission Type	Oppose

Submission Number:	16: 9	Submission Type:	Oppose
Submitter:	Neil Heather		
Submission Summary:	That Council confirm its rejection of presci the rules to prescriptive management of fa		agement and remove all references in
Decision Sought:	That Council confirm its rejection of prescr the rules to prescriptive management of fa	· · ·	agement and remove all references in
Panel Recommendations:	Reject		
Submission Number:	20: 8	Submission Type:	Oppose
Submitter:	Peter McLean and Michelle Rennie		
Submission Summary:	I do not support the requirement for land c a compliance process.	owners to complete farm	n management plans that will be part of
Decision Sought:	Not specified.		

Submission	Number:	23: 10	Submission Type: Oppose
Submitter:		Roger and N	rreen Martin
Submission	Summary:		ort the requirement for land owners to completed farm management plans. It was never farm plans would become part of the consent process.
Decision So	ught:	Not specified	
Panel Reco	mmendations:	Reject	
Submission	Number:	24: 6	Submission Type: Oppose
Submitter:		JT & SA But	erworth
Submission	Summary:	measure diffe compliance r with our advis	bur of farm management plans but they should only be a tool to help a farmer plan and rent mitigation solutions. They must not be part of any regulatory process nor the regime. A farm management plan needs to be a living document that is visited regulatory ors. All that is required for assessment of the output of nutrients from a property is the nutrient budget which we complete on an annual basis with our Ballance fertilizer but the budget which we complete on an annual basis with our Ballance fertilizer
Decision So	ught:	Farm manag	ment plans must not be part of any regulatory process nor the compliance regime.
Panel Reco	mmendations:	Reject	
Submission	Number:	39: 6	Submission Type: Oppose
Submitter:		Eileen Camp	pell
Submission	Summary:		ort the requirement of land owners to complete farm management plans that will be part of a cocess. It is impossible to develop a plan committing one's self to actions up to 15 years in
Decision So	ught:	Not specified	
Panel Reco	mmendations:	Reject	
Submission	Number:	43: 76	Submission Type: Support in Part
Submitter:		Ravensdown	Limited
Submission	Summary:	Ravensdown notified appr	supports the controlled activity status of the rule, and the intent of the rule to adopt a non-ach.
Decision So	ught:	Retain the connon-notified	ntrolled activity status of the rule, and the intention to consider any consent application on a asis.
Panel Reco	mmendations:	Accept	
Further Su	ıbmission(s)		
F	urther Submissi	on No:	15 - 27 Submission Type: Support
F	urther Submitte	r:	Ballance Agri-Nutrients Limited
S	ubmission Surr	imary:	Supports the activity status.
D	ecision Sought		As above
Р	anel Recomme	ndation:	Accept
Submission	Number:	43: 77	Submission Type: Support in Part
Submitter:		Ravensdown	Limited
Submission	Summary:	Condition (b)	should be amended refer to a Nutrient Management Plan.
Decision So	-		rient Management Plan in condition (b).

Further Submission(s)

	Further Submiss	ion No:	15 - 11	Submission Type:	Support
	Further Submitte	er:	Ballance Agri-Nutrie	nts Limited	
	Submission Sum	nmary:	terminology being us Canterbury, Waikato The use of "Nutrient	sed in other regions around New Zo and Southland. Management Plan" rather than "Ni the Plan, which isn't limited to man	trogen Management Plan" better
	Decision Sought	:	As above		
	Panel Recomme	endation:	Accept		
Submiss	ion Number:	43: 82		Submission Type: Submis	upport in Part
Submitte	er:	Ravensdown	Limited		
Submiss	ion Summary:			agement Plan, Council should requ e is a significant farm change.	re a Nutrient Budget be prepared
Decision	Sought:	Council shou farm change.		udget be prepared that is valid for 3	years, unless there is a significant
Panel R	ecommendations:	Reject			
Further	Submission(s)				
	Further Submiss	ion No:	15 - 30	Submission Type:	Support
	Further Submitte	er:	Ballance Agri-Nutrie	nts Limited	
	Submission Sum	nmary:		budget every 3 years is in keeping Management Plan templates.	with the requirements set out in a
	Decision Sought	:	As above		
	Panel Recomme	endation:	Reject		
Submiss	ion Number:	45: 8		Submission Type: O	opose
Submitte	er:	Wendy and J	ohn Roe		
Submiss	ion Summary:				nagement plans that will be part of irselves to actions up to 15 years in
Decision	Sought:	Not specified	l.		
Panel R	ecommendations:	Reject			
Submiss	ion Number:	61: 10		Submission Type: O	opose
Submitte	er:	Beef + Lamb	New Zealand		
Submiss	ion Summary:	counterintuiti prioritised act	ve to achieving action tions. Acknowledgeme	rm management through potentially at a sub catchment level, through c ent needs to be given to a whole far not just limited to Nitrogen.	oordinated, well supported and
Decision	Sought:				cordingly, remove all references in
			to prescribe and or ma	nt of farm plans. They should not b anage farm activities.	e used as a method by which

Further Submiss	ion No:	11 - 5 Submission Type: Support
Further Submitte	er:	Deer Industry New Zealand
Submission Sun	nmary:	Supports the removal of any input-based prescriptive management from the rules and a references in the rules to prescriptive management of farm plans until at least the completion of the science review. DINZ considers the submitters' requests are consister with an over-arching Accord approach.
Decision Sought	:	As above
Panel Recomme	endation:	Reject
Submission Number:	66: 10 Subi	mission Type: Oppose
Submitter:	Lake Rotorua	Primary Producers Collective
Submission Summary:	planning frame different mitiga A farm manag is required for	is supportive of measures to improve environmental performance within a holistic farm ework. Farm management plans should be a tool to help a farmer plan and measure ation solutions. They must not be part of any regulatory process nor the compliance regime ement plan needs to be a living document that is visited regularly with our advisors. All th assessment of the output of nutrients from a property is the OVERSEER® nutrient budg complete with their preferred fertiliser company or farm advisor.
Decision Sought:	That farm plan	s sit outside all regulatory measures and are used as a living planning tool.
Panel Recommendations:	Reject	
Submission Number:	67: 8	Submission Type: Oppose
Submitter:	Karl Weaver	
Submission Summary:		ort the requirement for landowners to complete farm management plans that will be part process. It is impossible to develop a plan committing oneself to actions up to 15 years in
	the future.	
Decision Sought:	Not specified.	
Decision Sought: Panel Recommendations:		
	Not specified.	Submission Type: Oppose
Panel Recommendations:	Not specified. Reject 70: 77	Submission Type: Oppose
Panel Recommendations: Submission Number:	Not specified. Reject 70: 77 The Fertiliser / Many farms m (5)(a)(ii).The d activity becaus Discharge Allo It is not clear h gradual land u from the outse Whilst Manage years, this sho	Association of New Zealand ay find it difficult to meet the conditions for controlled activities because Schedule LR Si ischarge of nutrients from many farms is at risk of requiring consent as a non-complying se the pathway and mitigations to achieve the Managed Reductions and 2032 Nitrogen wance are not likely to be available from the outset. now the Proposed Plan Change will provide for adaptive management principles and for se change if during the first stage reduction period, non-complying activity status applies
Panel Recommendations: Submission Number: Submitter: Submission Summary:	Not specified. Reject 70: 77 The Fertiliser / Many farms m (5)(a)(ii).The d activity becaus Discharge Allo It is not clear h gradual land u from the outse Whilst Manage years, this sho	Association of New Zealand ay find it difficult to meet the conditions for controlled activities because Schedule LR Si ischarge of nutrients from many farms is at risk of requiring consent as a non-complying se the pathway and mitigations to achieve the Managed Reductions and 2032 Nitrogen wance are not likely to be available from the outset. how the Proposed Plan Change will provide for adaptive management principles and for se change if during the first stage reduction period, non-complying activity status applies at. ed Reduction Targets and Nitrogen Discharge Allowances will need to be reviewed ever build not necessarily require consents with a 5 year duration. It could be achieved by way
Panel Recommendations: Submission Number: Submitter: Submission Summary:	Not specified. Reject 70: 77 The Fertiliser / Many farms m (5)(a)(ii).The d activity becaus Discharge Allo It is not clear h gradual land u from the outse Whilst Manage years, this sho reviewing the n	Association of New Zealand ay find it difficult to meet the conditions for controlled activities because Schedule LR Si ischarge of nutrients from many farms is at risk of requiring consent as a non-complying se the pathway and mitigations to achieve the Managed Reductions and 2032 Nitrogen wance are not likely to be available from the outset. how the Proposed Plan Change will provide for adaptive management principles and for se change if during the first stage reduction period, non-complying activity status applies at. ed Reduction Targets and Nitrogen Discharge Allowances will need to be reviewed ever build not necessarily require consents with a 5 year duration. It could be achieved by way
Panel Recommendations: Submission Number: Submitter: Submission Summary: Decision Sought: Panel Recommendations:	Not specified. Reject 70: 77 The Fertiliser / Many farms m (5)(a)(ii).The d activity becaus Discharge Allo It is not clear h gradual land u from the outse Whilst Manage years, this sho reviewing the r Not specified.	Association of New Zealand ay find it difficult to meet the conditions for controlled activities because Schedule LR Si ischarge of nutrients from many farms is at risk of requiring consent as a non-complying se the pathway and mitigations to achieve the Managed Reductions and 2032 Nitrogen wance are not likely to be available from the outset. how the Proposed Plan Change will provide for adaptive management principles and for se change if during the first stage reduction period, non-complying activity status applies at. ed Reduction Targets and Nitrogen Discharge Allowances will need to be reviewed ever build not necessarily require consents with a 5 year duration. It could be achieved by way
Panel Recommendations: Submission Number: Submitter: Submission Summary: Decision Sought:	Not specified. Reject 70: 77 The Fertiliser A Many farms m (5)(a)(ii).The d activity becaus Discharge Allo It is not clear h gradual land u from the outse Whilst Manage years, this sho reviewing the n Not specified. Reject in part	Association of New Zealand ay find it difficult to meet the conditions for controlled activities because Schedule LR Si ischarge of nutrients from many farms is at risk of requiring consent as a non-complying se the pathway and mitigations to achieve the Managed Reductions and 2032 Nitrogen wance are not likely to be available from the outset. now the Proposed Plan Change will provide for adaptive management principles and for se change if during the first stage reduction period, non-complying activity status applies at. ed Reduction Targets and Nitrogen Discharge Allowances will need to be reviewed ever build not necessarily require consents with a 5 year duration. It could be achieved by way relevant conditions of a 20 year consent.
Panel Recommendations: Submission Number: Submitter: Submission Summary: Decision Sought: Panel Recommendations: Submission Number: Submission Number:	Not specified. Reject 70: 77 The Fertiliser / Many farms m (5)(a)(ii).The d activity becaus Discharge Allo It is not clear h gradual land u from the outse Whilst Manage years, this sho reviewing the r Not specified. Reject in part 78: 5 Tony and Joar We support tha	Association of New Zealand ay find it difficult to meet the conditions for controlled activities because Schedule LR Si ischarge of nutrients from many farms is at risk of requiring consent as a non-complying se the pathway and mitigations to achieve the Managed Reductions and 2032 Nitrogen wance are not likely to be available from the outset. now the Proposed Plan Change will provide for adaptive management principles and for se change if during the first stage reduction period, non-complying activity status applies at. ed Reduction Targets and Nitrogen Discharge Allowances will need to be reviewed ever build not necessarily require consents with a 5 year duration. It could be achieved by way relevant conditions of a 20 year consent.
Panel Recommendations: Submission Number: Submitter: Submission Summary: Decision Sought: Panel Recommendations: Submission Number:	Not specified. Reject 70: 77 The Fertiliser / Many farms m (5)(a)(ii).The d activity becaus Discharge Allo It is not clear h gradual land u from the outse Whilst Manage years, this sho reviewing the n Not specified. Reject in part 78: 5 Tony and Joar We support the have them atta allows.	Association of New Zealand ay find it difficult to meet the conditions for controlled activities because Schedule LR Si ischarge of nutrients from many farms is at risk of requiring consent as a non-complying se the pathway and mitigations to achieve the Managed Reductions and 2032 Nitrogen wance are not likely to be available from the outset. now the Proposed Plan Change will provide for adaptive management principles and for se change if during the first stage reduction period, non-complying activity status applies at. ed Reduction Targets and Nitrogen Discharge Allowances will need to be reviewed ever build not necessarily require consents with a 5 year duration. It could be achieved by way relevant conditions of a 20 year consent.

Submission Number:	82: 9	Submission Type:	Oppose
Submitter:	Stuart Morrison		
Submission Summary:	I strongly oppose the use of Nitrogen Man inputs is against all discussions and agree living documents. There use should be as farm within the set environmental constrai OVERSEER®, should be the measure as	ments made at stakehol supporting evidence of nts. Outputs, that is nutr	der meetings. Plans by their nature are intentions for continuing to meet and ient discharges such as determined by
Decision Sought:	Change the relevant policies and rules inc	luding LR P8, LR P11, I	LR R9 and Schedule 6.
Panel Recommendation	s: Reject		
			4400

Section: Matter of Control (ii)

Panel Recommendation

See Section on LR R9 above.

Submissions

Submission Number:	43: 80	Submission Type:	Oppose in Part
Submitter:	Ravensdown Limited		
Submission Summary:	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.		
Decision Sought:	Delete matters of control (ii), or if retained, be limited to the requirement of a nutrient budget which show that the agreed targets are being met.		ement of a nutrient budget which shows

Panel Recommendations: Reject

Furthe	urther Submission(s)				
	Further Submission No: Further Submitter: Submission Summary: Decision Sought:		15 - 28	Submission Type	e: Support
			Ballance Agri-Nutrients Limited		
			Ballance considers the an restrictive.	the annual submission of such files to be costly and unnecessarily	
			Delete clause or amend to three years.	allow for the submission	of an OVERSEER® file every
	Panel Recomme	endation:	Reject		
Submission Number: 58: 13			Submission Type:	Oppose	
Submitter: Max Douglas		S			
to use OVER		Use of OVERSEER® for Compliance. The purpose is to reduce N pollution. Requiring us RSEER® does not do that. Forcing the use of OVERSEER® does increase compliance ode the rural lifestyle with paperwork and consultants.			
Decisior	Decision Sought: Change: provide a low intensity farming option that runs off stocking tables with minimal complia costs and paperwork with no OVERSEER®.		g tables with minimal compliance		
Panel Recommendations: Accept in part					
Submission Number: 70: 82			Submission Type:	Oppose	
Submitter: The Fertiliser Association of New Zealand					
Submiss	Submission Summary: Submission of an Annual OVERSEER® file is opposed as the model is a long term annual avera model and so the OVERSEER® nutrient budget should be valid for at least 3 years unless there i significant farm system change. Under Bullet (ii) the OVERSEER® Nutrient Budget file should be consistent with the Nutrient Management Plan.		r at least 3 years unless there is a		

Decision Sought: (ii) The submission of an OVERSEER® file, prepared by a suitably qualified and experienced person, which is consistent with the Nutrient Management Plan.

Panel Recommendations: Accept in Part

Section: Matter of Control (iii)

Panel Recommendation

Refer to Section on LR R9 above.

Submissions

Submission Number:	43: 81	Submission Type:	Oppose in Part
Submitter:	Ravensdown Limited		
Submission Summary:	Matters of control (iii) does not seem to be necessary and should be deleted.		
Decision Sought:	Delete matters of control (iii).		

Panel Recommendations: Accept in part

Further Submission(s)

Further Submission No:	15 - 29	Submission Type:	Support
Further Submitter:	Ballance Agri-Nutrien	ts Limited	
Submission Summary:	Ballance considers that it is inappropriate to require the written approval of a third party within a rule and questions the relevance of the clause.		
Decision Sought:			

Panel Recomme	endation: Accept in part		
Submission Number:	70: 80	Submission Type:	Oppose
Submitter:	The Fertiliser Association of New Zealand		
Submission Summary:	It is not understood why bullet (iii) is necessary.		
Decision Sought:	Delete.		
Panel Recommendations:	Accept in part		
Submission Number:	70: 82	Submission Type:	Oppose
Submitter:	The Fertiliser Association of New Zealand		
Submission Summary:	Submission of an Annual OVERSEER® file is opposed as the model is a long term annual average model and so the OVERSEER® nutrient budget should be valid for at least 3 years unless there is a significant farm system change. Under Bullet (ii) the OVERSEER® Nutrient Budget file should be consistent with the Nutrient Management Plan.		
Decision Sought:	(ii) The submission of an OVERSEER® file, prepared by a suitably qualified and experienced person, which is consistent with the Nutrient Management Plan.		ly qualified and experienced
Panel Recommendations:	Accept in Part		

Section: Matter of Control (v) **Panel Recommendation** See Section on LR R9 above. Submissions Submission Number: 43: 78 Submission Type: Oppose in Part Submitter: Ravensdown Limited Submission Summary: Matters of control (v) should be amended refer to a Nutrient Management Plan. Refer to a Nutrient Management Plan in matters of control (v). **Decision Sought:** Panel Recommendations: Accept Further Submission(s) Further Submission No: 15 - 12 Submission Type: Support Further Submitter: Ballance Agri-Nutrients Limited Submission Summary: Ballance considers that the use of the term "Nutrient Management Plan" is consistent with terminology being used in other regions around New Zealand, including but not limited to Canterbury, Waikato and Southland. The use of "Nutrient Management Plan" rather than "Nitrogen Management Plan" better reflects the intent of the Plan, which isn't limited to managing nitrogen as evidenced by Schedule LR6 within PPC 10. Decision Sought: As above Panel Recommendation: Accept Submission Number: 56: 16 Submission Type: Support Submitter: Bay of Plenty Regional Council Submission Summary: There is no trigger available to initiate the review of a approved consent and its associated NDA/NMP upon nutrients being sold to the Incentives Board or transferred. Decision Sought: Include the following words in the matters that Council reserves control over for LR R8 to 10(v) and LR R11 (vii): "Circumstances that may require a review of a Nitrogen Discharge Allowance or a Nitrogen Management Plan ...". Panel Recommendations: Accept 1106 Section: Matter of Control (vi)

Panel Recommendation

See Section on LR R9 above.

Submissions

Submission Number:	43: 79	Submission Type:	Oppose in Part
Submitter:	Ravensdown Limited		
Submission Summary:	Matters of control (vi) should be amended	refer to a Nutrient Mana	agement Plan.
Decision Sought:	Refer to a Nutrient Management Plan in matters of control (vi).		
Panel Recommendations:	Accept		

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Further Submission(s)

	15 - 13	Submission Type: Support
Further Submitter: Ballance	Agri-Nutrients Limited	
Submission Summary:	with terminology being use limited to Canterbury, Wail The use of "Nutrient Mana	gement Plan" rather than "Nitrogen Management Plan" better an, which isn't limited to managing nitrogen as evidenced by
Decision Sought:	As above	
Panel Recommendation:	Accept	

Section: LRR10 From 1/07/2022 the transfer of nitrogen loss entitlements

Panel Recommendation

Refer to the body of our report for our recommendation on this section.

Submissions

Submission Number:	13: 3	Submission Type:	Oppose
Submitter:	Alister Snodgrass		
Submission Summary:	Trading of nutrient entitlements should be available to all land holders.		
Decision Sought:	Trading of nutrient entitlements should be	available to all land ho	lders.
Panel Recommendations:	Reject		
Submission Number:	26: 22	Submission Type:	Oppose
Submitter:	Rotorua Lakes Council		
Submission Summary:	Resource efficiency is not adequately maximised if trading of nitrogen is not provided for until 2022. PC 10's moratorium on nitrogen trading until 2022 does not facilitate the preservation of value from existing on-farm capital investment. Provision for earlier trading will enable more efficient resource allocation.		
Decision Sought:	Amend LR P7 and LR R10 to enable the commencement of authorised transfer of nitrogen loss entitlements from the date on which Rule LR R10 becomes operative.		
Panel Recommendations:	Reject		
Submission Number:	32: 18	Submission Type:	Support
Submitter:	Kaitao Rotohokahoka 2D Trust		
Submission Summary:	The Trust supports the transfer of nitrogen loss entitlements between properties / farming enterprises.		
Decision Sought:	No changes requested.		
Panel Recommendations:	Accept		

Submitter:	Utuhina Valley Farm		
Submission Summary:	We oppose nutrient trading as this is contrary to the objective of reducing the total nutrient losses into the catchment.		
Decision Sought:	Not specified.		
Panel Recommendations:	Reject		
Submission Number:	40: 12 Submission Type: Support		
Submitter:	Maraeroa Oturoa 2B Trust		
Submission Summary:	The Trust supports this concept to allow for economic growth within the Lake Rotorua catchment while meeting environmental objectives.		
Decision Sought:	Support - No changes requested.		
Panel Recommendations:	Accept		
Submission Number:	43: 7 Submission Type: Support		
Submitter:	Ravensdown Limited		
Submission Summary:	Ravensdown supports the allowance of authorised transfer of nitrogen loss entitlements between properties/farming enterprises from 1 July 2022.		
Decision Sought:	Not specified.		
Panel Recommendations:	Accept		

Submiss	ion Number:	43: 83 Submission Type: Support in Part		
Submitte	er:	Ravensdown Limited		
Submiss	ion Summary:	Ravensdown supports 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.		
Decision	Sought:	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.		
Panel R	ecommendations:	Accept		
Submiss	ion Number:	49: 74 Submission Type: Oppose in Part		
Submitte	er:	CNI Iwi Land Management Ltd		
Submiss	ion Summary:	The structure of the rules at present makes it a permitted activity for the higher leaching land uses to trade among themselves, but it excludes the lowest leaching activities from any such trade. This is inefficient in terms of potential economic outcomes, inequitable, unfair and unreasonable.		
Decision	Sought:	Reword this rule and make consequential changes to other rules, to ensure that there is no limitation on the type of initial land use that may purchase nitrogen loss entitlements.		
Panel R	ecommendations:	Accept in Part		
Further	Submission(s)			
	Further Submiss	sion No: 14 - 36 Submission Type: Support		
	Further Submitte	er: Hancock Forest Management (NZ) Ltd		
	Submission Sum	nmary: For the reasons given in the original submission.		
	Decision Sought	t: As above		
	Panel Recomme	endation: Accept in Part		
Submiss	ion Number:	53: 54 Submission Type: Oppose		
Submitte	er:	Lachlan McKenzie		
Submiss	ion Summary:	The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our integrated nutrient management framework.		
Decision	Sought:	Delete.		
Panel R	ecommendations:	Reject		
Submiss	ion Number:	56: 21 Submission Type: Support		
Submitte	er:	Bay of Plenty Regional Council		
Submiss	ion Summary:	The assessment criteria do not link to Policy LR P16 by providing the ability to consider consent duration.		
Decision	Sought:	Add an additional matter of control under LRR8, LRR9, LRR10, LRR11 ' The duration of the consent to reflect the nature, scale and robustness of any on farm mitigation options proposed.		
Panel R	ecommendations:	Accept		
Submiss	ion Number:	56: 24 Submission Type: Support		
Submitte	er:	Bay of Plenty Regional Council		
Submiss	ion Summary:	Need to add an explanation as to how consents will be used implement trading.		
Decision	Sought:	Insert new advice note as follows: "3. The transfer of nitrogen between properties either as Managed Reduction Offsets (short term trading) or Nitrogen Discharge Allowances (long term trading) is implemented by the issuing of new resource consents and new Nitrogen Management Plans for the source and destination land."		
Panel R	ecommendations:	Accept		
		·		

Submission Number:	66: 25	Submission Type: Oppose		
Submitter:	Lake Rotorua	Primary Producers Collective		
Submission Summary:	include comm	PC 10 should provide an enabling framework for a wider portfolio of nutrient reduction strategies to include community wide mitigation solutions. In addition to trading of long-term allowances, we would like to see provision for the leasing of nutrient allowances.		
Decision Sought:		The Collective supports the establishment of trading as a tool to allow land owners to meet the staged reduction target. Trading should not be restricted to after 2022.		
Panel Recommendations:	Reject			
Submission Number:	75: 186	Submission Type: Oppose		
Submitter:	Federated Fa	mers of New Zealand		
Submission Summary:	policies; and t	rules recommended by the submitter give better effect to RPS and RWLP objectives and our recommended changes to LR proposed policies. It is the submitter's submission that cus for these rules is the period to 2022.		
Decision Sought:	Delete.			
Panel Recommendations:	Reject			
Submission Number:	78: 6	Submission Type: Oppose		
Submitter:	Tony and Joa	nna Carr		
Submission Summary:		at all farmers should engage in this process, but with their industry representative body. To ached to consents takes away all possible innovation that adaptive farm management		
Decision Sought:	Farm Nutrient	Plans must sit outside the regulatory process.		
Panel Recommendations:	Reject			
Submission Number:	78: 14	Submission Type: Support in Part		
Submitter:	Tony and Joa	na Carr		
Submission Summary:	target. In addi nutrient allowa	e establishment of trading as a tool to allow land owners to meet the staged reduction tion to trading of long-term allowances, we would like to see provision for the leasing of ances. This is likely to increase flexibility and market efficiency, as well as reduce the urden for BOPRC by enabling short-term fluctuations to be resolved with short-term nutrient		
Decision Sought:		Id not be restricted to after 2022. In addition to trading of long-term allowances, we would vision for the leasing of nutrient allowances.		
Panel Recommendations:	Reject			
Further Submission(s)				
Further Submiss	ion No:	6 - 50 Submission Type: Support in Part		
Further Submitte	er:	CNI Iwi Land Management Ltd		
Submission Sun	nmary:	For the reasons given in the original submission. CNILML supports leasing of nutrient discharge units rather than their permanent allocation. Leasing will reduce the likelihood that nutrient discharge units become capitalised into the value of land.		
Decision Sought	:	As above		
Panel Recommendation: Reject				

Section: LR R10(b)

Panel Recommendation

See Section on LR R10 above.

Submissions

Submission Number:	70: 13	Submission Type:	Oppose		
Submitter:	The Fertiliser Association of New Zealand	I			
Submission Summary:	It is not clear under the current wording of the Proposed Plan Change how Council will be able to provide any flexibility for any viable farming activity through step wise adaptive management, if the pathway to achieve the 2032 NDA from the outset is required as a condition of controlled resource consent.				
Decision Sought:	It should be recognised that economically Allowance are unlikely to be available from		nieve 2032 Nitrogen Discharge		
Panel Recommendations:	Reject				
			4400		

Section: LR R10(c)

Panel Recommendation

See Section on LR R10 above.

Submissions

16: 11	Submission Type:	Oppose			
Neil Heather					
That Council confirm its rejection of prescriptive input-based management and remove all references in the rules to prescriptive management of farm plans.					
		agement and remove all references			
Reject					
20: 9	Submission Type: C	Dppose			
Peter McLean and Michelle Rennie					
I do not support the requirement for land owners to complete farm management plans that will be part of a compliance process.					
Not specified.					
Reject					
23: 11	Submission Type:	Oppose			
Roger and Norreen Martin					
I do not support the requirement for land owners to completed farm management plans. It was never intended that farm plans would become part of the consent process.					
Not specified					
	Neil Heather That Council confirm its rejection of prescriptive management of That Council confirm its rejection of prescriptive management of That Council confirm its rejection of prescriptive management of Reject 20: 9 Peter McLean and Michelle Rennie I do not support the requirement for land of a compliance process. Not specified. Reject 23: 11 Roger and Norreen Martin I do not support the requirement for land of intended that farm plans would become part	Neil Heather That Council confirm its rejection of prescriptive input-based man in the rules to prescriptive management of farm plans. That Council confirm its rejection of prescriptive input-based man in the rules to prescriptive management of farm plans. Reject 20: 9 Submission Type: O Peter McLean and Michelle Rennie I do not support the requirement for land owners to complete farm a compliance process. Not specified. Reject 23: 11 Submission Type: Roger and Norreen Martin I do not support the requirement for land owners to complete farm a compliance process.			

Submission Number:	24: 7		Submission Type:	Oppose	
Submitter:	JT & SA Butte	erworth			
Submission Summary:	We are in favour of farm management plans but they should only be a tool to help a farmer plan and measure different mitigation solutions. They must not be part of any regulatory process nor the compliance regime. A farm management plan needs to be a living document that is visited regulatory with our advisors. All that is required for assessment of the output of nutrients from a property is the OVERSEER® nutrient budget which we complete on an annual basis with our Ballance fertiliser representative.				
Decision Sought:	Farm manage	ment plans must not be pa	art of any regulatory proc	cess nor the compliance regime.	
Panel Recommendations:	Reject				
Submission Number:	43: 84		Submission Type:	Support in Part	
Submitter: Ravensdowr		Limited			
Submission Summary: Condition (c		should be amended refer to a Nutrient Management Plan.			
Decision Sought:	Refer to a Nut	rient Management Plan in	condition (c).		
Panel Recommendations:	Accept				
Further Submission(s)					
Further Submission No:					
Further Submiss	ion No:	15 - 14	Submission Ty	pe: Support	
Further Submiss		15 - 14 Ballance Agri-Nutrients L		pe: Support	
	er:	Ballance Agri-Nutrients L Ballance considers that th terminology being used in Canterbury, Waikato and The use of "Nutrient Mana	imited to use of the term "Nutrie other regions around Ne Southland. agement Plan" rather tha 'lan, which isn't limited to		
Further Submitte	er: nmary:	Ballance Agri-Nutrients L Ballance considers that th terminology being used in Canterbury, Waikato and The use of "Nutrient Mana reflects the intent of the P	imited to use of the term "Nutrie other regions around Ne Southland. agement Plan" rather tha 'lan, which isn't limited to	ent Management Plan" is consistent with ew Zealand, including but not limited to n "Nitrogen Management Plan" better	

Out						
Submissi	on Number: 43: 89		Submission Type: Support in Part			
Submitte	er:	Ravensdown	Limited			
Submissi	ion Summary:	As part of requiring a Nutrient Management Plan, Council should require a Nutrient Budget be prepa that is valid for 3 years, unless there is a significant farm change.				
Decision	Sought:	Require a Nu	trient Budget be prepared that is valid for 3 years, unless there is a significant farm change.			
Panel Re	ecommendations:	Reject				
Submissi	ion Number:	61: 11	Submission Type: Oppose			
Submitte	er:	Beef + Lamb New Zealand				
Submissi	ion Summary:	counterintuiti prioritised ac	rent approach to on farm management through potentially prescriptive farm plans is ve to achieving action at a sub catchment level, through coordinated, well supported and tions. Acknowledgement needs to be given to a whole farm approach to managing the acts on water quality, not just limited to Nitrogen.			
Decision	Sought:	Delete any reference to prescriptive input-based management; and accordingly, remove all refere the rules to prescriptive management of farm plans. They should not be used as a method by whic councils aim to prescribe and or manage farm activities.				
Panel Re	ecommendations:	Reject				
Further	· Submission(s)					
	Further Submiss	ion No:	11 - 6 Submission Type: Support			
	Further Submitte	er:	Deer Industry New Zealand			
Submission Summary:						
	Submission Sun	nmary:	Supports the removal of any input-based prescriptive management from the rules and all references in the rules to prescriptive management of farm plans until at least the completion of the science review. DINZ considers the submitters' requests are consistent with an over-arching Accord approach.			
	Submission Sun Decision Sought		references in the rules to prescriptive management of farm plans until at least the completion of the science review. DINZ considers the submitters' requests are consistent			
		:	references in the rules to prescriptive management of farm plans until at least the completion of the science review. DINZ considers the submitters' requests are consistent with an over-arching Accord approach.			
Submissi	Decision Sought	:	references in the rules to prescriptive management of farm plans until at least the completion of the science review. DINZ considers the submitters' requests are consistent with an over-arching Accord approach. As above			
Submissi	Decision Sought Panel Recomme ion Number:	: endation: 66: 13	references in the rules to prescriptive management of farm plans until at least the completion of the science review. DINZ considers the submitters' requests are consistent with an over-arching Accord approach. As above Reject			
Submitte	Decision Sought Panel Recomme ion Number:	: endation: 66: 13 Lake Rotorua The Collectiv planning fran different mitio A farm mana is required fo	references in the rules to prescriptive management of farm plans until at least the completion of the science review. DINZ considers the submitters' requests are consistent with an over-arching Accord approach. As above Reject Submission Type: Oppose			
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Submitte Submissi Decision	Decision Sought Panel Recomme ion Number: er: ion Summary:	endation: 66: 13 Lake Rotorua The Collectiv planning fram different mitig A farm mana is required fo most farmers	references in the rules to prescriptive management of farm plans until at least the completion of the science review. DINZ considers the submitters' requests are consistent with an over-arching Accord approach. As above Reject Submission Type: Oppose a Primary Producers Collective re is supportive of measures to improve environmental performance within a holistic farm nework. Farm management plans should be a tool to help a farmer plan and measure gation solutions. They must not be part of any regulatory process nor the compliance regime. Igement plan needs to be a living document that is visited regularly with our advisors. All that or assessment of the output of nutrients from a property is the OVERSEER® nutrient budget is complete with their preferred fertiliser company or farm advisor.			
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Submitte Submissi Decision Panel Re Submissi Submitte	Decision Sought Panel Recomme ion Number: er: ion Summary: Sought: ecommendations:	endation: 66: 13 Lake Rotorua The Collectiv planning fram different mitig A farm mana is required fo most farmers That farm pla Reject 67: 9 Karl Weaver I do not supp	references in the rules to prescriptive management of farm plans until at least the completion of the science review. DINZ considers the submitters' requests are consistent with an over-arching Accord approach. As above Reject Submission Type: Oppose a Primary Producers Collective Primary Producers Collective re is supportive of measures to improve environmental performance within a holistic farm nework. Farm management plans should be a tool to help a farmer plan and measure gation solutions. They must not be part of any regulatory process nor the compliance regime. gement plan needs to be a living document that is visited regularly with our advisors. All that or assessment of the output of nutrients from a property is the OVERSEER® nutrient budget is complete with their preferred fertiliser company or farm advisor. ans sit outside all regulatory measures and are used as a living planning tool. Submission Type: Oppose			
Submitte Submissi Decision Panel Re Submissi Submitte	Decision Sought Panel Recomme ion Number: er: ion Summary: Sought: ecommendations: ion Number: er: ion Summary:	endation: 66: 13 Lake Rotorua The Collectiv planning fram different mitig A farm mana is required fo most farmers That farm pla Reject 67: 9 Karl Weaver I do not supp compliance p	references in the rules to prescriptive management of farm plans until at least the completion of the science review. DINZ considers the submitters' requests are consistent with an over-arching Accord approach. As above Reject Submission Type: Oppose a Primary Producers Collective re is supportive of measures to improve environmental performance within a holistic farm nework. Farm management plans should be a tool to help a farmer plan and measure gation solutions. They must not be part of any regulatory process nor the compliance regime. Igement plan needs to be a living document that is visited regularly with our advisors. All that or assessment of the output of nutrients from a property is the OVERSEER® nutrient budget is complete with their preferred fertiliser company or farm advisor. ans sit outside all regulatory measures and are used as a living planning tool. Submission Type: Oppose bort the requirement for landowners to complete farm management plans that will be part of a process. It is impossible to develop a plan committing oneself to actions up to 15 years in the			

Submiss	ion Number:	70: 78	Submission Type: Oppose			
Submitte	er:	The Fertiliser Association of New Zealand				
Submission Summary:		(5)(a)(ii). Pre adaptive ma non-complyi	may find it difficult to meet the conditions for controlled activities because Schedule LR Six esenting 'from the outset' a pathway for achieving 2032 DNA's is contrary to the principles of nagement. The discharge of nutrients from many farms is at risk of requiring consent as a ng activity because the pathway and mitigations to achieve the Managed Reductions and en Discharge Allowance are not likely to be available from the outset.			
			r how the Proposed Plan Change will provide for adaptive management principles and for l use change if during the first stage reduction period, non-complying activity status applies set.			
		Whilst Managed Reduction Targets and Nitrogen Discharge Allowances will need to be reviewed every 5 years, this should not necessarily require consents with a 5 year duration. It could be achieved by way of reviewing the relevant conditions of a 20 year consent.				
Decision	Sought:	Not specified.				
Panel Re	ecommendations:	Reject				
Further	Submission(s)					
	Further Submiss	ion No:	12 - 27 Submission Type: Support			
	Further Submitte	er:	Federated Farmers of New Zealand			
	Submission Sum	nmary:	For the reasons given in the original submission.			
	Decision Sought	:	As above			
Panel Recomm		endation:	Reject			
Submiss	ion Number:	82: 10	Submission Type: Oppose			
Submitte	er:	Stuart Morrison				
Submission Summary:		inputs is aga living docum farm within t	pose the use of Nitrogen Management Plans as a compliance tool. Targeting compliance to ainst all discussions and agreements made at stakeholder meetings. Plans by their nature are rents. There use should be as supporting evidence of intentions for continuing to meet and he set environmental constraints. Outputs, that is nutrient discharges such as determined by (®, should be the measure assessed to check compliance.			
Decision	Sought:	Change the	relevant policies and rules including LR P8, LR P11, LR R9 and Schedule 6.			
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Section: Matter of Control (ii)

Panel Recommendation

See Section on LR R10 above.

Submissions

Submission Number:	43: 87	Submission Type: Oppose in Part
Submitter:	Ravensdown Limited	
Submission Summary:	Matters of control (ii) should be deleted, or that the agreed targets are being met.	r be limited to the requirement of a nutrient budget which shows
Decision Sought:	Delete matters of control (ii), or if retained, that the agreed targets are being met.	, be limited to the requirement of a nutrient budget which shows
Panel Recommendations:	Reject	

Submission Number:	64: 21	Submission Type:	Support in Part			
Submitter:	DairyNZ and Fonterra Co-operative Group Limited					
Submission Summary:	The focus should be on showing compliance with the nitrogen loss trajectory to achieve the MRT and toward the NDA rather than effectively an input control approach through implementing specific actions in the Farm Plan.					
Decision Sought:	Amend to: (ii) The submission of an annu- experienced person, demonstrating on-go a rolling output average basis as calculate	oing compliance with the	trajectory toward the MRT and NDA or			
Panel Recommendations:	Reject					
Submission Number:	70: 83	Submission Type:	Oppose			
Submitter:	The Fertiliser Association of New Zealand	d				
Submission Summary:	Submission of an Annual OVERSEER® model and so the OVERSEER® nutrient significant farm system change. Under Bu consistent with the Nutrient Management	budget should be valid f ullet (ii) the OVERSEER®	or at least 3 years unless there is a			
Decision Sought:	(ii) The submission of an OVERSEER® f person, which is consistent with the Nutri		ly qualified and experienced			
Panel Recommendations:	Reject					

Section: Matter of Control (iii)

Panel Recommendation

See Section on LR R10 above.

Submissions

Submission Number:	43: 88	Submission Type:	Oppose in Part				
Submitter:	Ravensdown Limited						
Submission Summary:	Matters of control (iii) does not seem to be necessary.						
Decision Sought:	Delete matters of control (iii).	Delete matters of control (iii).					
Panel Recommendations:	Accept in part						
Submission Number:	70: 81	Submission Type:	Oppose				
Submitter:	The Fertiliser Association of New Zealand	d					
Submission Summary:	It is not understood why bullet (iii) is necessary.						
Decision Sought:	Delete.						
Panel Recommendations:	Accept in part						

Section: Matter of Control (iv)

Panel Recommendation

See Section on LR R10 above.

Submissions

Submitter:	Bay of Plenty Regional Council					
Submission Summary: Con		the data inputs and protocols for dative the wording in LR R9(iv) and LR SEER® reference.				
Decision Sought:	Substitute the test from point LR R9(iv) with the text in LR R10(iv).					
Panel Recommendations:	Accept					
Submission Number:	70: 84	Submission Type:	Oppose			
Submitter:	The Fertiliser Association of N	New Zealand				
Submission Summary:		Groundwater Catchment Nitrogen P ts including a specific reference to th	rotocols' has not been referenced his document or an explanation as an			
Decision Sought:	(iv)' Regional Council (av	ailable from the Council offices).				
	Accept in part					

Panel Recommendation

See Section on LR R10 above.

Submissions

Submission Number:	43: 85	Submission Type:	Support in Part			
Submitter:	Ravensdown Limited					
Submission Summary:	Matters of control (v) should be amended refer to a Nutrient Management Plan.					
Decision Sought:	Refer to a Nutrient Management Plan in matters of control (v).					

Panel Recommendations: Accept

Further Submission(s)

i uitilei	500111351011(5)					
	Further Submission No: Further Submitter: Submission Summary: Decision Sought: Panel Recommendation:		15 - 15	Submission Typ	pe:	Support
			Ballance Agri-Nutrients Limited Ballance considers that the use of the term "Nutrient Management Plan" is consistent with terminology being used in other regions around New Zealand, including but not limited to Canterbury, Waikato and Southland. The use of "Nutrient Management Plan" rather than "Nitrogen Management Plan" better reflects the intent of the Plan, which isn't limited to managing nitrogen as evidenced by Schedule LR6 within PPC 10. As above			
Submiss	ion Number:	56: 17		Submission Type:	Sup	port
Submitte	Submitter: Bay of Plent		/ Regional Council			
Submiss				e the review of a approved co entives Board or transferred.	onsent	and its associated NDA/NMP
Decision	Sought:		rcumstances that may r	atters that Council reserves ca equire a review of a Nitrogen		over for LR R8 to 10(v) and LR arge Allowance or a Nitrogen
Panel R	ecommendations:	Accept				

anel Recommendatio				
See Section on LR R10	above.			
ubmissions				
ubmission Number:	43: 86		Submission Type:	Support in Part
ubmitter:	Ravensdowr	Limited		
ubmission Summary:	Matters of co	ontrol (vi) should be a	amended refer to a Nutrient Ma	anagement Plan.
Decision Sought:	Refer to a N	utrient Management I	Plan in matters of control (vi).	
anel Recommendations:	Accept			
urther Submission(s)				
Further Submiss	ion No:	15 - 16	Submission Ty	ype: Support
Further Submitte	er:	Ballance Agri-Nutr	ients Limited	
Submission Summary: Decision Sought:		Ballance considers that the use of the term "Nutrient Management Plan" is consistent with terminology being used in other regions around New Zealand, including but not limited to Canterbury, Waikato and Southland. The use of "Nutrient Management Plan" rather than "Nitrogen Management Plan" better reflects the intent of the Plan, which isn't limited to managing nitrogen as evidenced by Schedule LR6 within PPC 10. As above		
Panel Recomn	nendation:	Accept		
	C.4: 00		Outoringing Types	Ourse and in Dant
ubmission Number:	64: 22	Fontorro Co operati	Submission Type:	Support in Part
Submission Summary: The focus sh		DA rather than effect	compliance with the nitrogen lo	ss trajectory to achieve the MRT and through implementing specific actions in
ecision Sought:	Delete.			
Panel Recommendations: Reject				
ubmission Number:	64: 23		Submission Type:	Support in Part
Submitter: DairyNZ and		Fonterra Co-operativ	ve Group Limited	
ubmission Summary:	toward the N	DA rather than effect		ss trajectory to achieve the MRT and through implementing specific actions in
toward the NDA rather than effectively an input control approach through implementing specific activities the Farm Plan. Decision Sought: Amend to: (vi) Implementation of the Nitrogen Management Plan, or actions that will have an equivies or greater N loss benefit as calculated / modelled through OVERSEER® being used as set out in (i				

Section: Matter of Control (vii)

Panel Recommendation

See Section on LR R10 above.

Submission Number: Submitter:	64: 24 DairyNZ and Fonterra Co-operative Group	Submission Type: Support in Part Limited
Submission Summary:	Amend to:on-going compliance with basis as calculated from the annual OVERS	the trajectory toward the MRT on a rolling output average SEER® file monitoring requirement.'
Decision Sought:	Amend to:'on-going compliance with basis as calculated from the annual OVERS	the trajectory toward the MRT on a rolling output average SEER® file monitoring requirement.'
Panel Recommendations:	Reject	

Section: LRR11 Farm activity not readily modelled by OVERSEER®

Panel Recommendation

Refer to our report for our recommendations on this section.

Submissions					
Submission Number:	3: 5	Submission Type:	Support		
Submitter:	Kaingaroa Timberlands Partnership				
Submission Summary:	Unique land uses must be provided for especially as the growing of seedlings to supply afforestation and replanting of forests in the catchment and the region is vital in helping to achieve the policies for nitrogen reduction.				
Decision Sought:	Unique land uses must be provided for.				
Panel Recommendations:	Accept				
Submission Number:	21: 10	Submission Type:	Oppose		
Submitter:	Brown Owl Organics Incorporated				
Submission Summary:	We oppose this rule because the coding variability we have observed. Non-conv well covered by OVERSEER® . If the C "controlled" category, a nitrogen manag	entional methods of farmin council deemed small-scal	ng and horticulture do not appear to be e organic land uses to fall into this		
Decision Sought:	Not specified.				
Panel Recommendations:	Reject in part				
Submission Number:	30: 8	Submission Type: Su	pport in Part		
Submitter:	Fish & Game New Zealand (Eastern Re	egion Fish and Game Cou	uncil)		
Submission Summary:	For land use operations that do not fit in nitrogen limitations must be allocated.				
Decision Sought:	For land use operations that do not fit in nitrogen limitations must be allocated.				
Panel Recommendations:	Accept				
Submission Number:	32: 11	Submission Type:	Oppose		
Submitter:	Kaitao Rotohokahoka 2D Trust				
Submission Summary:	The Trust requests a longer timeframe f modelling before setting the allocation r consents in concrete.				
Decision Sought:	Extend the timeframe to set rules, meet reductions.	nitrogen reduction targets	s and measure progress towards		
	Reject				

Submission Number: 43:90 Submission Type: Oppose Submitsein Ravensdown Limited Submission Summary: 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 OVERSEER8, The farming activity can be assessed to be undertakten (Rules LR RA-10). Decision Sought: Delete Rule LR R11. Panel Recommendations: Reject Submission Number: 49:75 Submission Type: Support in Part Submission Summary: This rule is almed at those properties within the groundwater but not surface water catchment, but its principles could equality be used for other activities than the radional farming ones that OVERSEER8 has been designed to model, and to avoid total capture by a trademarked box for this whole nutrient assessment process. Decision Sought: Revend as: The use of land on properties in the Lake Rotorua groundwater catchment! Panel Recommendations: Reject Submission Number: 53:55 Submission Type: Oppose Submission Summary: The alternate rules recommended to be sole of the avoid total capture by a trademarked box for this whole an utrient assessment process. Submission Number: 53:55 Submission Type: Oppose Submission Summary: The alternate rules recommended tops the tetre ef	Outoring Number	42: 22	Outorianian Tanan	0
Submission Summary: This rule is it not required and can be deleted. Schedule LR Six has provision for an alternative model for farms that cannot be modeled with OVERSEER8. 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 R&10). Decision Sought: Delete Rule LR R11. Panel Recommendations: Reject Submission Number: 49: 75 Submission Type: Support In Part Submission Summary: This rule is almost at those properties within the groundwater but not surface water catchment, but its provision could quality be used for orbit activities than the traditional farming ones that OVERSEER8 has been designed to model, and to avoid total capture by a trademarked box for this whole nutrient assessment process. Decision Sought: Reword as: The use of land on properties in the Lake Rotorus groundwater catchment,			Submission Type:	Oppose
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 Re10). Decision Sought: Delete Rule LR R11. Panel Recommendations: Reject Submission Number: 49: 75 Submission Type: Support in Part Submission Summary: This rule is aimed at those properties within the groundwater but not surface water catchment, but its principles could equally be used for other activities than the traditional farming ones that OVERSEER® has been designed to model, and to avoid total capture by a trademarked box for this whole nutrient assessment process. Decision Sought: Reword as: The use of land on properties in the Lake Rotorua groundwater catchment' Panel Recommendations: Reject Submission Number: 53: 55 Submission Type: Oppose Submission Number: 56: 22 Submission Type: Support Submission Summary: The atternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our imegrated nutrient management framework. Decision Sought: Delete. Panel Recommendations: Reject Submission Number: 56: 22 Submission Type: Support Submission Sought: Delete. <t< td=""><td></td><td></td><td></td><td></td></t<>				
Panel Recommendations: Reject Submission Number: 49: 75 Submission Type: Support in Part Submission Summary: This rule is aimed at those properties within the groundwater but not surface water catchment, but its principles could equally be used for other activities than the traditional farming ones that OVERSEER® has been designed to model, and to avoid total capture by a trademarked box for this whole nutrient assessment process. Decision Sought: Reword as: The use of land on properties in the Lake Rotorua groundwater catchment' Panel Recommendations: Reject Submission Number: 53: 55 Submission Type: Oppose Submission Summary: The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our integrated nutrient management framework. Decision Sought: Delete. Panel Recommendations: Reject Submission Number: 56: 22 Submission Type: Support Submission Sought: Delete. Easter Submission Type: Support Submission Sought: Bay of Plenty Regional Council Submission Type: Support Submission Sought: An additional matter of control under LRR8, LRR9, LRR10, LRR11 'The duration of the consent to reflect the nature, scale and robustness of any on farm mitigation options proposed.	Submission Summary:	farms that cannot be modelled with OVERS relevant rule, as long as there is a provision	SEER® . The farming a	ctivity can be assessed under another
Submission Number: 49: 75 Submission Type: Support in Part Submission Number: CNI live Land Management Ltd Submission Summary: This rule is aimed at those properties within the groundwater but not surface water catchment, but its principles could equally be used for other activities than the traditional farming ones that OVERSEER® has been designed to model, and to avoid total capture by a trademarked box for this whole nutrient assessment process. Decision Sought: Reword as: The use of land on properties in the Lake Rotorua groundwater catchment' Panel Recommendations: Reject Submission Number: 53: 55 Submission Type: Oppose Submission Summary: The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our integrated nutrient management framework. Decision Sought: Delete. Panel Recommendations: Reject Submission Number: 56: 22 Submission Type: Support Submission Sought: Delete. Bay of Plenty Regional Council Submission Sought: Bay of Plenty Regional Council Submission Type: Support Submission Number: 64: 25 Submission Type: Support in Part Submission Number: 64: 25 Submission Type: Support in Part Submission Number:	Decision Sought:	Delete Rule LR R11.		
Submitter: CNI I wi Land Management Ltd Submitser: This rule is aimed at those properties within the groundwater but not surface water catchment, but its principles could equally be used for other activities than the traditional farming ones that OVERSEER® has been designed to model, and to avoid total acputer by a trademarked box for this whole nutrient assessment process. Decision Sought: Reword as: The use of land on properties in the Lake Rotorua groundwater catchment' Panel Recommendations: Reject Submitser: Lachlan McKenzie Submission Summary: The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our integrated nutrient management framework. Decision Sought: Delete. Panel Recommendations: Reject Submission Number: 56: 22 Submission Type: Support Submission Summary: The assessment criteria do not link to Policy LR P16 by providing the ability to consider consent duration. Decision Sought: Add an additional matter of control under LRR8, LRR9, LRR10, LRR11' The duration of the consent to reflect the nature, scale and robustness of any on farm mitigation options proposed. Panel Recommendations: Accept Submission Summary: DairyNZ and Fonterra Co-operative Group Limited Submission Summary: DairyNZ and Fonterra Co-operative Group Limited	Panel Recommendations:	Reject		
Submission Summary: This rule is aimed at those properties within the groundwater but not surface water catchment, but its principles could equally be used for other activities than the traditional farming ones that OVERSEER® has been designed to model, and to avoid total capture by a trademarked box for this whole nutrient assessment process. Decision Sought: Reword as: The use of land on properties in the Lake Rotorua groundwater catchment' Panel Recommendations: Reject Submission Number: 53: 55 Submission Type: Oppose Submission Summary: The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our infegrated nutrient management framework. Decision Sought: Delete. Panel Recommendations: Reject Submission Number: 56: 22 Submission Type: Support Submission Summary: The assessment criteria do not link to Policy LR P16 by providing the ability to consider consent duration. Decision Sought: Add an additional matter of control under LRR8, LRR9, LRR10, LRR11 'The duration of the consent to reflect the nature, scale and robustness of any on farm mitigation options propeed. Panel Recommendations: Accept Submission Number: 64: 25 Submission Type: Submission Number: DairyNZ and Fonterra Support this rule cocuncil should carify the intended maxing	Submission Number:	49: 75	Submission Type:	Support in Part
principles could equally be used for other activities than the traditional farming ones that OVERSEER® (Name) to avoid total capture by a trademarked box for this whole nutrient assessment process. Decision Sought: Reword as: The use of land on properties in the Lake Rotorua groundwater catchment' Panel Recommendations: Reject Submission Number: 53: 55 Submission Type: Oppose Submission Summary: The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our integrated nutrient management framework. Decision Sought: Delete. Panel Recommendations: Reject Submission Number: 56: 22 Submission Type: Support Submission Summary: The assessment criteria do not link to Policy LR P16 by providing the ability to consider consent duration. Decision Sought: Bay of Plenty Regional Council Submission Summary: The assessment criteria do not link to Policy LR P16 by providing the ability to consider consent to reflect the nature, scale and robustness of any on farm mitigation options proposed. Panel Recommendations: Accept Submission Number: 64: 25 Submission Type: Support in Part Submission Summary: DairyNZ and Fonterra Co-operative Group Limited Submission Summary: DairyNZ and Fonterra Co-op	Submitter:	CNI Iwi Land Management Ltd		
Panel Recommendations: Reject Submission Number: 53: 55 Submission Type: Oppose Submission Summary: The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our integrated nutrient management framework. Decision Sought: Delete. Panel Recommendations: Reject Submission Number: 56: 22 Submission Type: Support Submission Summary: The assessment criteria do not link to Policy LR P16 by providing the ability to consider consent duration. Decision Sought: Bay of Plenty Regional Council Submission Summary: The assessment criteria do not link to Policy LR P16 by providing the ability to consider consent duration. Decision Sought: Add an additional matter of control under LRR8, LR8, LR8, LR10, LRR11 'The duration of the consent to reflect the nature, scale and robustness of any on farm mitigation options proposed. Panel Recommendations: Accept Submission Number: 64: 25 Submission Type: Support in Part Submission Summary: DairyNZ and Fonterra support this rule council should clarify the intended meaning of the subjective "readily". If one sector or enterprise type identifies that OVERSEER® does not "readily" model an activity type there is scope for inequitable outcomes. Decision Sought: Limit the application of this rule to enterprises	Submission Summary:	principles could equally be used for other a OVERSEER® has been designed to mode	ctivities than the tradition	onal farming ones that
Submission Number: 53: 55 Submission Type: Oppose Submission Summary: The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our integrated nutrient management framework. Decision Sought: Delete. Panel Recommendations: Reject Submission Number: 56: 22 Submission Type: Support Submission Summary: The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our integrated nutrient management framework. Decision Sought: Delete. Submission Number: 56: 22 Submission Type: Support Submission Summary: The assessment criteria do not link to Policy LR P16 by providing the ability to consider consent duration. Decision Sought: Add an additional matter of control under LRR8, LRR9, LRR10, LRR11 'The duration of the consent to reflect the nature, scale and robustness of any on farm miligation options proposed. Panel Recommendations: Accept Submission Number: 64: 25 Submission Type: Support in Part Submission Summary: DairyNZ and Fonterra Co-operative Group Limited Submission Summary: DairyNZ and Fonterra support this rule council should clarify the intended meaning of the subjective "readity' if one sector or integrinse type identifies that OVERSEER® does not "readity" i	Decision Sought:	Reword as: 'The use of land on properties	in the Lake Rotorua gro	oundwater catchment'
Submitter: Lachlan McKenzie Submission Summary: The alternate rules recommended give better effect to RPS and RWLP objectives and policies; and to our integrated nutrient management framework. Decision Sought: Delete. Panel Recommendations: Reject Submission Number: 56: 22 Submission Type: Support Submission Summary: The assessment criteria do not link to Policy LR P16 by providing the ability to consider consent duration. Decision Sought: Add an additional matter of control under LRR8, LRR9, LRR10, LRR11 'The duration of the consent to reflect the nature, scale and robustness of any on farm mitigation options' proposed. Panel Recommendations: Accept Submission Number: 64: 25 Submission Type: Support in Part Submission Summary: DairyNZ and Fonterra Support his rule council should clarify the intended meaning of the subjective treadily'. If one sector or enterprise type identifies that OVERSEER® does not "readily' model an activity type three is scope for inequitable outcomes. Decision Sought: Limit the application of this rule to enterprises / activities that are not recognised in OVERSEER® or are exceptional in complexity. Panel Recommendations: Accept in Part Submission Number: 65: 7 Submission Type: Oppose Submission Number: 65: 7 Submission Type: Oppose	Panel Recommendations:	Reject		
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Decision Sought: Should specifically state the rule does not apply to properties that are permitted under LR R3.	Submission Summary:			ectares, residential property. This is
Panel Recommendations: Accept in Part	Decision Sought:	Should specifically state the rule does not a	apply to properties that	are permitted under LR R3.
	Panel Recommendations:	Accept in Part		

Submission Number:	70: 86	Submission Type:	Support in Part
Submitter:	The Fertiliser Association of New Zealance	ł	
Submission Summary:	Given alternative models to OVERSEER® the process in Schedule LR One does not		Regional Council' it is not clear why
Decision Sought:	LR R11 would benefit from guidance on how the Managed Reduction Targets and Nitrogen Discharge Allowances should be derived, if not following the principles in Schedule LR One.		
Panel Recommendations:	Reject		
Outomission Number	75.407	Outoring Trans	0
Submission Number:	75: 187	Submission Type:	Oppose
Submitter:	Federated Farmers of New Zealand		
Submission Summary:	The alternate rules recommended by the s policies; and to our recommended change the primary focus for these rules is the per	es to LR proposed policie	
Decision Sought:	Delete.		
Panel Recommendations:	Reject		

Section: LR R11(a)

Panel Recommendation

Refer to Section on LR R11 above.

Submissions

70: 85	Submission Type:	Support in Part
The Fertiliser Association of New Zealand	ł	
Allowances, under LR P 8, however it rem	ains unclear how these	are to be determined if not by
5	5	0 0 0
Reject		
	The Fertiliser Association of New Zealand LR R11 requires Nitrogen Management P Allowances, under LR P 8, however it rem OVERSEER® or an alternative model au LR R11 would benefit from guidance on h Allowances should be derived, if not follow	The Fertiliser Association of New Zealand LR R11 requires Nitrogen Management Plan, Managed Reductior Allowances, under LR P 8, however it remains unclear how these OVERSEER® or an alternative model authorised by Regional C LR R11 would benefit from guidance on how the Managed Reduc Allowances should be derived, if not following the principles in Scl

Section: LR R11(b)

Panel Recommendation

Refer to Section on LR R11 above.

Submissions

Submission Number:	3: 5	Submission Type:	Support
Submitter:	Kaingaroa Timberlands Partnership		
Submission Summary:	Unique land uses must be provided for ex replanting of forests in the catchment and reduction.		
Decision Sought:	Unique land uses must be provided for.		
Panel Recommendations:	Accept		
Submission Number:	16: 12	Submission Type:	Oppose

Submitter:	Neil Heather	
Submission Summary:		confirm its rejection of prescriptive input-based management and remove all references in
,		rescriptive management of farm plans.
Decision Sought:		confirm its rejection of prescriptive input-based management and remove all references in rescriptive management of farm plans.
Panel Recommendations:	Reject	
Submission Number:	20: 10	Submission Type: Oppose
Submitter:	Peter McLear	n and Michelle Rennie
Submission Summary:	l do not supp a compliance	ort the requirement for land owners to complete farm management plans that will be part of process.
Decision Sought:	Not specified	
Panel Recommendations:	Reject	
Submission Number:	23: 12	Submission Type: Oppose
Submitter:	Roger and No	prreen Martin
Submission Summary:		ort the requirement for land owners to completed farm management plans. It was never farm plans would become part of the consent process.
Decision Sought:	Not specified	
Panel Recommendations:	Reject	
Submission Number:	24: 8	Submission Type: Oppose
Submitter:	JT & SA Butt	erworth
Submission Summary:	measure diffe compliance re with our advis	our of farm management plans but they should only be a tool to help a farmer plan and arent mitigation solutions. They must not be part of any regulatory process nor the agime. A farm management plan needs to be a living document that is visited regulatory sors. All that is required for assessment of the output of nutrients from a property is the nutrient budget which we complete on an annual basis with our Ballance fertiliser e.
Decision Sought:	Farm manage	ement plans must not be part of any regulatory process nor the compliance regime.
Panel Recommendations:	Reject	
Submission Number:	61: 12	Submission Type: Oppose
Submitter:	Beef + Lamb	New Zealand
Submission Summary:	counterintuitiv	rent approach to on farm management through potentially prescriptive farm plans is ve to achieving action at a sub catchment level, through coordinated, well supported and ions. Acknowledgement needs to be given to a whole farm approach to managing the acts on water quality, not just Nitrogen.
Decision Sought:	the rules to p	ference to prescriptive input-based management; and accordingly, remove all references in rescriptive management of farm plans. They should not be used as a method by which to prescribe and or manage farm activities.
Panel Recommendations:	Reject	
Further Submission(s)		
Further Submiss	ion No:	11 - 7 Submission Type: Support
Further Submitte	er:	Deer Industry New Zealand
Submission Sum	nmary:	Supports the removal of any input-based prescriptive management from the rules and all references in the rules to prescriptive management of farm plans until at least the completion of the science review. DINZ considers the submitters' requests are consistent with an over-arching Accord approach.
Decision Sought	::	As above
		1

Submission Number:	66: 11 Submission Type: Oppose
Submitter:	Lake Rotorua Primary Producers Collective
Submission Summary:	The Collective is supportive of measures to improve environmental performance within a holistic farm planning framework. Farm management plans should be a tool to help a farmer plan and measure different mitigation solutions. They must not be part of any regulatory process nor the compliance regime. A farm management plan needs to be a living document that is visited regularly with our advisors. All that is required for assessment of the output of nutrients from a property is the OVERSEER® nutrient budget most farmers complete with their preferred fertiliser company or farm advisor.
Decision Sought:	That farm plans sit outside all regulatory measures and are used as a living planning tool.
Panel Recommendations:	Reject
Submission Number:	67: 10 Submission Type: Oppose
Submitter:	Karl Weaver
Submission Summary:	I do not support the requirement for landowners to complete farm management plans that will be part of a compliance process. It is impossible to develop a plan committing oneself to actions up to 15 years in the future.
Decision Sought:	Not specified.
Panel Recommendations	: Reject
Submission Number:	70: 14 Submission Type: Oppose
Submitter:	The Fertiliser Association of New Zealand
Submission Summary:	It should be recognised that economically viable mitigations to achieve 2032 Nitrogen Discharge Allowance are unlikely to be available from the outset. It is not clear under the current wording of the Proposed Plan Change how Council will be able to provide any flexibility for any viable farming activity through step wise adaptive management, if the pathway to achieve the 2032 NDA from the outset is required as a condition of controlled resource consent.
Decision Sought:	It should be recognised that economically viable mitigations to achieve 2032 Nitrogen Discharge Allowance are unlikely to be available from the outset.
Panel Recommendations:	Reject
Submission Number:	78: 7 Submission Type: Oppose
Submitter:	Tony and Joanna Carr
Submission Summary:	We support that all farmers should engage in this process, but with their industry representative body. To have them attached to consents takes away all possible innovation that adaptive farm management allows.
Decision Sought:	Farm Nutrient Plans must sit outside the regulatory process.
Panel Recommendations:	Reject
Submission Number:	82: 11 Submission Type: Oppose
Submitter:	Stuart Morrison
Submission Summary:	I strongly oppose the use of Nitrogen Management Plans as a compliance tool. Targeting compliance to inputs is against all discussions and agreements made at stakeholder meetings. Plans by their nature are living documents. There use should be as supporting evidence of intentions for continuing to meet and farm within the set environmental constraints. Outputs, that is nutrient discharges such as determined by OVERSEER®, should be the measure assessed to check compliance.
	Observe the relevant religion and rules including LD D0 LD D44 LD D0 and Ochestula C
Decision Sought:	Change the relevant policies and rules including LR P8, LR P11, LR R9 and Schedule 6.

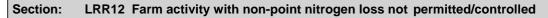
Section: Matter of control (vii)

Panel Recommendation

Refer to Section on LR R11 above.

Submissions

Submission Number:	56: 18	Submission Type:	Support
Submitter:	Bay of Plenty Regional Council		
Submission Summary:	There is no trigger available to ir upon nutrients being sold to the		onsent and its associated NDA/NMP
Decision Sought:	5		ontrol over for LR R8 to 10(v) and LR Discharge Allowance or a Nitrogen
Panel Recommendations:	Accept		
			112



Panel Recommendation

Refer to our report for our recommendations on this section.

Submissions

Submission Number:	43: 91		Submission Type:	Oppose
Submitter:	Ravensdowr	Limited		
Submission Summary:	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. 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. The plan requires some flexibility which a non-complying activity does not allow.			
Decision Sought:	Amend Rule LR R12 to be a Discretionary Activity.			
Panel Recommendations:	Reject			
Further Submission(s)				
Further Submiss	sion No:	6 - 51	Submission Typ	e: Support
Further Submitter:		CNI Iwi Land Management Ltd		
Submission Summary: For the r		For the reasons given ir	s given in the original submission.	
Decision Sough	Sought: As above			
Panel Recomm	endation:	Reject		

Submission Number:	49: 76		Submission Type:	Oppose
Submitter:	CNI Iwi Land M	anagement Ltd		
Submission Summary:	application is ex	stremely unlikely to be	e granted. This means that sh	luded to signal that the consent hould CNI want to develop any of the hould CNI want to develop any of the h impossible. CNI has been completely
Decision Sought:	of the underlyin		create a restricted discretiona	plantation forestry, with no consideration ary rule to allow for land use according to
Panel Recommendations:	Reject			
Submission Number:	53: 56		Submission Type:	Oppose
Submitter:	Lachlan McKen	zie		
Submission Summary:		lles recommended gi ent management frar		RWLP objectives and policies; and to ou
Decision Sought:	Delete.			
Panel Recommendations:	Reject			
Submission Number:	70: 11		Submission Type:	Oppose
Submitter:	The Fertiliser A	ssociation of New Ze	aland	
Submission Summary:	Nitrogen Discha Providing a path meet the contro does a farm der	arge Allowance (NDA hway to meet this ND illed activity condition monstrate only 'minor) must be met (as that proper A is one of the conditions for s, the discharge of nutrients b ' adverse effects in terms of i	Ichieve the Lake TLI, the property rties proportion of the total load.) controlled consent. If a farm cannot becomes a non-complying activity. How nutrient loss levels i.e. how do activities is compounded by the wording of the
Decision Sought:	Amend Rule LR period 2017 to 2		liscretionary or Restricted Dis	scretionary consent during the transition
Panel Recommendations:	Reject			
Submission Number:	70: 87		Submission Type:	Oppose in Part
Submitter:	The Fertiliser As	ssociation of New Ze	aland	
Submission Summary:	controlled activi	ties trip directly to no ve very significant ec	n complying status. The cons	nply with conditions for permitted or sequence of non-complying activity ns. These have not been considered by
Decision Sought:	Amend Rule LR period 2017 to 2		liscretionary or Restricted Dis	scretionary consent during the transition
Panel Recommendations:	Reject			
Further Submission(s)				
Further Submissi	ion No:	15 - 48	Submission Typ	pe: Support
Further Submitte	er: E	Ballance Agri-Nutrien	ts Limited	
Submission Sum	2 	significant number of Ballance considers a	farms/farming enterprises be non-complying activity status be more appropriate and Cou	he current rule could result in a ecoming non-complying activities. s to be overly restrictive. A discretionary incil could still decline applications for
Decision Sought:	: /	As above		

Submission Number:	75: 188	Submission Type:	Oppose
Submitter:	Federated Farmers of New Zealand		
Submission Summary:	The alternate rules recommended by the s policies; and to our recommended change the primary focus for these rules is the per	s to LR proposed policie	
Decision Sought:	Delete.		
Panel Recommendations:	Reject		

Section: LR R13 Incidental nutrient discharges

Panel Recommendation

We concur with the Regional Council reporting officers' recommendations as contained in their s42A report and additional evidence presented during the hearing.

Submissions

26: 34	Submission Type:	Support in Part
Rotorua Lakes Council		
for reduced and more appropriate complian	nce costs for smaller lar	nd holders, PC 10 must allow the
Amend LR P9 and LR R1 to R7 and R13 to	give effect to RLC's s	ubmissions.
Reject in part		
53: 57	Submission Type:	Support
Lachlan McKenzie		
upport for clarity.		
Retain.		
Accept		
66: 92	Submission Type:	Support
Lake Rotorua Primary Producers Collectiv	e	
Support.		
Retain for clarity.		
Accept		
70: 88	Submission Type:	Support
The Fertiliser Association of New Zealand		
Rule LR R13 reflects the provisions of the discussed under LR P9(h).	RMA, and is supported	subject to consideration of intent as
Retain subject to consideration of intent as	discussed under LR P	9(h).
Accept		
75: 189	Submission Type:	Support
Federated Farmers of New Zealand		
Support for clarity.		
Retain.		
(otali ii		
	Rotorua Lakes Council RLC supports LR P9 and its accompanying for reduced and more appropriate compliant Rotorua communities to continue to provide Amend LR P9 and LR R1 to R7 and R13 to Reject in part 53: 57 Lachlan McKenzie upport for clarity. Retain. Accept 66: 92 Lake Rotorua Primary Producers Collective Support. Retain for clarity. Accept 70: 88 The Fertiliser Association of New Zealand Rule LR R13 reflects the provisions of the discussed under LR P9(h). Retain subject to consideration of intent as Accept 75: 189 Federated Farmers of New Zealand Support for clarity.	Rotorua Lakes Council RLC supports LR P9 and its accompanying rules (LRR1 - R7 and for reduced and more appropriate compliance costs for smaller lar Rotorua communities to continue to provide for their social, culture Amend LR P9 and LR R1 to R7 and R13 to give effect to RLC's is Reject in part 53: 57 Submission Type: Lachlan McKenzie upport for clarity. Retain. Accept 66: 92 Submission Type: Lake Rotorua Primary Producers Collective Support. Retain for clarity. Retain for clarity. Retain for clarity. Submission Type: Lake Rotorua Primary Producers Collective Support. Retain for clarity. Retain for clarity. Retain for clarity. Submission Type: Lake Rotorua Primary Producers Collective Support. Retain for clarity. Accept 70: 88 Submission Type: The Fertiliser Association of New Zealand Rule LR R13 reflects the provisions of the RMA, and is supported discussed under LR P9(h). Retain subject to consideration of intent as discussed under LR P Accept 75: 189 Submission Type: Federated Farmers of New Zealand Support for clarity.