



RUAPEHU DISTRICT COUNCIL

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To: Horizons Regional Council
 Email: oneplan@horizons.govt.nz

Subject: **ONE PLAN - PROPOSED ONE PLAN CHANGE 2 – EXISTING INTENSIVE FARMING LAND USES**

Submission from: Ruapehu District Council
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Council wishes to speak in support of its submission.

1 INTRODUCTION

1.1 Ruapehu District Council (RDC) would like to thank Horizons Regional Council for the opportunity to submit on the Proposed One Plan - Plan Change 2 (PC2) – Existing Intensive Farming Land Uses.

1.2 Background of Ruapehu District

The Ruapehu District is one of New Zealand's largest districts by land area, of which, 36% is Crown owned. It has a small population of approximately 13,000 scattered throughout a wide geographical area of 6,730 square kilometres, of which 40% of residents identify as Māori. Per capita, the Ruapehu District has one of the highest visitor numbers in Aotearoa. The area is predominantly rural and includes the Tongariro and Whanganui National Parks, a large portion of the Whanganui River and many tributaries cementing the District's rich natural environment and history as pivotal in Aotearoa's identity.

The Ruapehu District ... where adventure begins!



2 PLAN CHANGE 2

- 2.1 The main purpose of PC2 is to address issues with the One Plan provisions that manage nutrient loss from existing intensive farming land uses (dairy farming, commercial vegetable growing, cropping, and intensive sheep and beef) in targeted Water Management Sub-zones.
- 2.2 PC2 proposes to:
- (a) Recalibrate the cumulative nitrogen leaching maximums (CNLM) in Table 14.2 to reflect improvements in the nutrient modelling software tool, Overseer.
 - (b) Reinforce good management practices as part of intensive farming land use activities.
 - (c) Provide a workable pathway for landowners to apply for consent for existing intensive farming land use activities that cannot achieve Table 14.2 cumulative nitrogen leaching maximums.

3 SUPPORT FOR JOINT SUBMISSION

- 3.1 RDC supports the joint submission from the local territorial authorities across the Manawatu-Whanganui Region. RDC believes that the joint submission addresses the challenges all districts will face, or have the potential to face, due to the provisions proposed in PC2 and the use of Overseer and table 14.2.

4 EFFECTS ON RDC

- 4.1 PC2 only applies to provisions relating to the existing use of land for intensive farming i.e. dairy farming, commercial and vegetable growing, cropping and intensive sheep and beef farming.
- 4.2 Regulation of intensive farming (primarily through not exceeding the nitrogen leaching maximums in Table 14.2) only applies to existing intensive farming in targeted Water Management Sub-zones set out in rule 14-1 and rule 14-3 new (conversions) intensive farming anywhere in the region. PC2 makes no amendments to the provisions relating to new intensive farming activities, apart from new intensive farming activities being subject to the updates to Table 14.2. While it might be considered as a separate plan change RDC thinks it should be considered as a whole.
- 4.3 PC2 essentially alters the nutrient leaching rates. In releasing PC2 ahead of PC3, HRC are clearly setting the parameters of individual catchment development without accounting for the catchment characteristics. This restricts the opportunity to engage at a local level.
- 4.4 While PC2 correspondence (especially in regard to nutrient leaching rates) talks about intensive farming with reference to cropping and dairy, it is not explicitly excluding other potential land use.
- 4.5 Land application systems and loading rates for bio-solids, wetlands and wastewater discharges to land have not been made permissible. The category of permissible activity will provide certainty and clarity for investors seeking to move from discharges direct to water, to discharging to land.
- 4.6 Remaining silent on new land uses does not provide guidance to decision makers, which results in the rules being applied to consent in unforeseen ways such as the Foxton Consent.



- 4.7 The current rules and policies could trigger a land use consent requirement in addition to a need for a discharge consent. This imposes limits on acceptable rates of nitrogen leaching. The consequence is that policies in the One Plan encourages land application to become impractical to meet.

5 RECCOMENDATIONS

- 5.1 RDC recommends an investigation into the use of Overseer as a viable option for the future, as HRC has no control over the updates and recalibrations that could result in further unforeseen consequences, and the need for more possible plan changes. Any change in algorithm is not visible to Council and therefore provides no certainty.
- 5.2 Overseer is a third party product and was designed for all land use types. It relies on volume applied to calculate nitrogen movement. Wastewater discharges are much greater than those used in intensive farms.
- 5.3 RDC recommends pathways be created for new intensive farming land uses to meet the needs and expectations of the RMA through the One Plan.
- 5.4 Should HRC continue with the proposed changes of PC2, RDC recommends ensuring that local engagement takes place with stakeholders involved when setting the parameters of individual catchment developments and not taking a one size fits all approach.
- 5.5 To assist in clear local engagement, PC2 should provide clear guidance to decision makers in terms of permissible activities.
- 5.6 RDC recommends the deletion of table 14.2 and the new development of policies that provide pathways for both existing and new intensive farm land uses, while giving effect to the environmental, cultural, social and economic impacts of the affected water management sub zones.



