

Planning Evidence and Recommendations Report

***Horizons Regional Council's Planners Report on
Submissions to the Proposed One Plan***



June 2008

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Planner

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INTRODUCTION TO CHAPTER 5: LAND

*This report contains the recommendations from Horizons Regional Council's Planners on submissions to the Proposed One Plan. These recommendations are **NOT** Council recommendations or final decisions.*

Horizon Regional Council's Proposed One Plan was notified on Thursday 31 May 2007. The closing date to lodge submissions on the document with Horizons Regional Council was Friday 31 August 2007, late submissions were accepted through to Sunday 30 September 2007. Further submissions were accepted from 17 November 2007 through to Wednesday 19 December 2007.

During the submission period 467 submissions and 62 further submissions were received from Individuals (314), Organisations/Companies (149), Iwi (18), Territorial Authorities (15), Interest Groups (10), Central Government organisations (19), District Health Boards (2) and Regional Councils (2). The submissions addressed a large number of matters in the Proposed One Plan and associated Section 32 Report. This document is the Planning Evidence and Recommendations Report; it contains the recommendations made by Horizons Regional Council's Planners to the Hearings Panel having considered the submissions received to the Proposed One Plan.

The submissions and further submissions to the Proposed One Plan have been assessed by Horizons Regional Council's Planners having regard to:

- The One Plan Philosophy and intent
- Section 32 Report
- Technical evidence
- Resource Management Act responsibilities
- Case Law

Horizons Regional Council Staff met with some submitters to clarify points raised or negotiate potential outcomes and sought advice from technical advisors as appropriate. As noted in the readers guide, the recommendations on submissions do not have any statutory weight. Instead, they are intended to assist the Hearing Panel to (a) consider the merits of the Proposed One Plan in light of submissions received and to (b) assist submitters by setting out responses to the points raised.

In reading the recommendations, please note that the Recommendation [#] is a unique number for the recommendation related to a particular part of the Proposed One Plan. The recommendation indicates whether the Hearing Evidence Report recommends that the Hearing Panel either "accepts", "rejects" or "accepts in part" the submissions made. Accept in part means the recommendation is to accept only part of the decision requested in that submission. Unless detailed otherwise where the primary submission has been accepted it follows that the further submissions supporting the primary submission have been accepted, and that the further submissions opposing the primary submitter have been rejected.

The Planning Evidence and Recommendations Report includes the following:

- Part 1 Reader's guide
- Part 2 Statement of Qualification and Experience

- A statement of qualifications and experience by Horizons Regional Council's Planner.
- Part 3 Summary of key themes
 - Provides a summary of the key recommendations.
- Part 4 Recommendations on submissions to the Proposed One Plan, including wording changes to give effect to recommendations.

PART ONE: READERS GUIDE

Structure of Report

The Planning Evidence and Recommendations Report on submissions relating to Chapter 5: Land includes:

- Part 1 Reader's guide
- Part 2 Statement of Qualifications and Experience
- Part 3 Summary of key themes
 - Provides a summary of the key submission themes and recommendations relating to Chapter 5: Land and the relevant provisions of Chapter 12 – Land Use Activities and Land-Based Biodiversity.
- Part 4 Recommendations on submissions on Chapter 5: Land and the relevant provisions of Chapter 12 – Land Use Activities and Land-Based Biodiversity of the Proposed One Plan; includes tables of submitters, submission points and recommendations (accept / accept in part / reject), technical and planning assessments and wording changes to implement recommendations:

Chapter 5 - Land

- Recommendation Land 1 Chapter 5: General
- Recommendation Land 2 Chapter 5: Paragraph 5.1 Scope
- Recommendation Land 3 Chapter 5: Paragraph 5.1.1 Chapter Content
- Recommendation Land 4 Chapter 5: Paragraph 5.1.2 Accelerated Erosion
- Recommendation Land 5 Chapter 5: Paragraph 5.1.3 Land and soil management
- Recommendation Land 6 Chapter 5: Issue 5-1 Accelerated Erosion
- Recommendation Land 7 Chapter 5: Objective 5-1 Accelerated Erosion
- Recommendation Land 8 Chapter 5: Policy 5-1 Sustainable management of highly erodible land – whole farm business plans
- Recommendation Land 9 Chapter 5: Policy 5-2 Sustainable management of other land – whole farm business plans
- Recommendation Land 10 Chapter 5: Policy 5-3 Regulation of vegetation clearance and land disturbance on highly erodible land

- Recommendation Land 11 Chapter 5: Policy 5-4 Regulation of significant disturbance on land that is not highly erodible land
- Recommendation Land 12 Chapter 5 Policy 5-5 Codes of practice and best management practices
- Recommendation Land 13 Chapter 5 Method General
- Recommendation Land 14 Chapter 5 Method Sustainable Land Use Initiative – Hill Country Erosion
- Recommendation Land 15 Chapter 5 Method Wanganui Catchment Strategy
- Recommendation Land 16 Chapter 5 Method Education in Schools Land
- Recommendation Land 17 Chapter 5 Sustainable Land Use Initiative Soil Health
- Recommendation Land 18 Chapter 5 Method Land Research, Monitoring and Reporting Programme
- Recommendation Land 19 Chapter 5 Method Infrastructure Protection
- Recommendation Land 20 Chapter 5 Method Sustainable Land Use Codes of Practice and Best Management Practices
- Recommendation Land 21 Chapter 5 Anticipated Environmental Results Table Row 1
- Recommendation Land 22 Chapter 5 Explanations and Principal Reasons

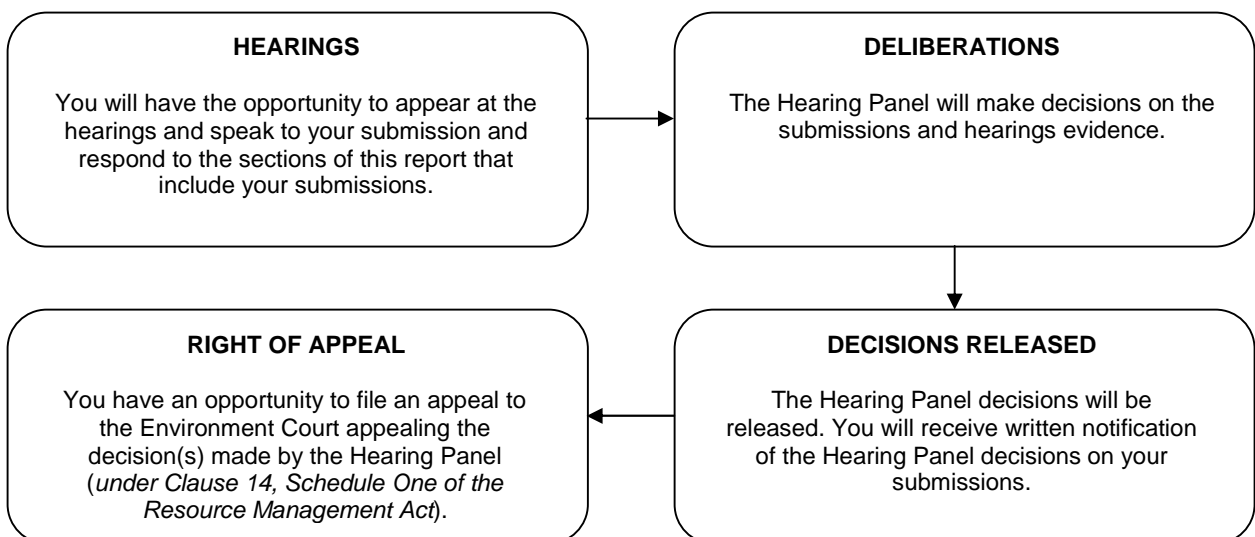
Chapter 12 – Land Use Activities and Land-Based Biodiversity

- Recommendation Land 23 Chapter 12 General General
- Recommendation Land 24 Chapter 12 Policy General
- Recommendation Land 25 Policy 12-1 Consent decision-making for vegetation clearance and land disturbance.
- Recommendation Land 26 Chapter 12 Policy 12-2 Recognition of industry standards
- Recommendation Land 27 Chapter 12 Policy 12-3 Important and essential activities
- Recommendation Land 28 Chapter 12 Policy 12-4 Large-scale consents
- Recommendation Land 29 Chapter 12 Rules Sub Heading 12.2 Vegetation clearance and land disturbance rules

- Recommendation Land 30 Chapter 12 Rule General
- Recommendation Land 31 Chapter 12 Rule 21-1 Vegetation clearance and land disturbance not covered by other rules.
- Recommendation Land 32 Chapter 12 Rule 12-2 Production forestry
- Recommendation Land 33 Chapter 12 Rule 12-3 Land Disturbance
- Recommendation Land 34 Chapter 12 Rule 12-4 Vegetation clearance
- Recommendation Land 35 Chapter 12 Rule 12-5 Vegetation clearance and land disturbance on coastal foredunes and near waterbodies
- Recommendation Land 36 Chapter 12 Rule 12-6 Vegetation clearance and land disturbance that do not comply with permitted and controlled activity rules
- Recommendation Land 37 Schedule A
- Recommendation Land 38 Glossary terms - Land

1.1 Process from Here

This Hearing Evidence Report has been written to assist the Hearing Panel in the decision making process. The process for the decision making is set out below for your information:



PART TWO: STATEMENT OF QUALIFICATIONS AND EXPERIENCE

My full name is Phillip Harry Percy. I have a Bachelor of Resource and Environmental Planning with honours degree (specialisation in physical geography) from Massey University. I have been practising as a planner for over ten years. This has included working as a policy planner for Greater Wellington Regional Council as well as a range of senior planning positions in multidisciplinary consultancies in New Zealand. In my various roles as a planning consultant I have been involved in submissions and hearings on a range of planning documents at both regional and district level. I have significant experience as a user of planning documents through the assessment of projects and proposals and obtaining resource consents for a variety of activities, including for infrastructure and roading, discharges to land, water and air and large-scale earthworks activities. I have also worked as a Planner in the United Kingdom, including in consent processing, enforcement and monitoring roles.

I am currently Director of a planning consultancy business, Perception Planning Limited, which I established in 2007.

I have been involved in the later stages of the development of the Proposed One Plan. I was involved in developing components of the provisions for managing non-point source discharges and prepared the Section 32 report prior to notification of the Proposed One Plan.

PART THREE: SUMMARY OF KEY THEMES AND RECOMMENDATIONS

The purpose of this summary is to provide an overview of the submissions received to Chapter 5: Land and those provisions of Chapter 12 – Land Use Activities and Land-based Biodiversity that relate to land management in the Proposed One Plan (POP) and the recommendations to the Hearing Panel. Due to the significant number of submissions received and the complexity of the issues raised, the Planning Evidence and Recommendations Report is a large document and submitters and the Hearing Panel may wish to have a short summary of the issues raised and the direction Horizons Regional Council's Planners have recommended in response to each issue. The following summary attempts to provide such an overview.

3.1 Evaluation of costs and benefits of provisions in the POP, in particular Whole Farm Business Plans

A large number of submitters (majority via a pro forma submission) requested that the Chapter 5: Land in its entirety, or specific provisions, be removed from the POP and that appropriate objectives and policies only be introduced once sufficient evaluation of the costs and benefits of the provisions has occurred. In particular, submitters have raised concerns about the costs to individual landowners and the wider community of retiring productive land through the Whole Farm Business Plan (WFBP) programme. In comparison, several submitters have requested that the controls on the use of highly erodible land are made more stringent and that greater controls are put in place.

Related to this matter, a number of submitters have requested that consultation with affected parties must occur. Concern is raised by some submitters that the proposed methods for managing erodible land are not backed up with hard evidence.

There appears to be a need for clarification as to the WFBP approach and how it fits into the POP framework. To assist with the understanding of the WFBP approach, expert evidence is provided in conjunction with this report to outline the origins of the WFBP method and to explain how it is applied. I expect that this explanation will resolve the concerns of many of the submitters, particularly those submitters concerned that WFBPs are compulsory or that there compulsory retirement of productive land is a requirement of the POP. The supporting evidence demonstrates that the WFBP approach is based on sound science and has been through rigorous evaluative processes, the outcome of which is a programme that is predicted to improve the degree to which the Region's land resources are sustainably managed.

3.2 Controls on land disturbance and vegetation clearance

A significant number of submitters have raised concerns about the controls in the POP that relate to land disturbance and vegetation clearance. Submitters have requested that the actual areas/volumes specified in the rules for vegetation and land disturbance are amended (both upwards and downwards). Other submitters

have raised concerns about the way in which the rules are worded and seek amendments to both clarify the rules and to make them less restrictive for particular activities. In particular there are a number of requested changes to the way in which vegetation clearance and land disturbance takes place close to waterways, and to the types of vegetation that can be cleared.

There are a number of recommended modifications to the provisions in the POP, particularly the wording of the rules and related definitions, to provide greater clarity and to make the provisions more appropriate to managing common land use activities. However the requests to remove controls on vegetation clearance and land disturbance, or to significantly relax them, are not considered to be appropriate as this potentially undermines the 'backstop' that the rules provide in relation to the non-regulatory methods promoted in the POP (such as WFBPs and codes of practice).

3.3 Use of non-regulatory methods

The POP includes a number of non-regulatory methods which are intended to be instrumental to achieving the objectives and policies of the POP. Some submitters support these approaches, with some submitters offering/requesting to be actively involved where possible. Other submitters seek to have more emphasis placed on non-regulatory methods, particularly methods related to education and information provision. Submitters also seek some amendments to the proposed methods to improve clarity and relevance.

Some alterations are necessary to some of the methods to improve their clarity and applicability. In general, the methods, particularly in relation to education, are considered to have sufficient scope to enable them to be effective in achieving the objectives of the POP and to support the regulatory initiatives therein.

3.4 Cross-references to other chapters

A number of submitters have requested that improved cross-references to other chapters within the POP are included within the Chapter 5 and Chapter 12. These include a request that there are specific linkages created between the Te Ao Maori chapter in the Regional Policy Statement (RPS) and Chapter 5 and Chapter 12. Other submitters have requested minor amendments to correct omissions or to improve clarity.

Linkages between sections within the POP, particularly between the RPS and the Regional Plan (RP) components, is important to provide for clarity and ease of use. While the current layout of the POP already provides linkages, particularly to the Te Ao Maori chapter in the RPS, some improvements are recommended.

3.5 Management of plantation forestry

Several submitters have requested changes to the objectives, policies, rules and methods of the POP to, mainly, provide for production forestry to occur with minimal regulatory constraints. This includes adopting the New Zealand Environmental Code of Practice for Plantation Forestry, and compliance with that code making forestry activities permitted activities. Submitters have also requested that there is

increased opportunity for forestry activities to occur as permitted activities rather than controlled activities as at present.

The POP has been written to support the use of appropriately developed codes of practice to be used to minimise requirements for resource consents for particular activities. However it is essential that this approach supports only those codes of practice that will appropriately achieve the environmental outcomes of the POP. At present, the New Zealand Environmental Code of Practice for Plantation Forestry does not meet this level of achievement and cannot therefore be adopted.

Some amendments to specific provisions within the POP are proposed to improve clarity.

3.6 Renewable energy development

Submitters, particularly energy generation organisations, have requested that the POP includes specific provisions related to energy generation in order to make the establishment and maintenance of those facilities more permissive. The supporting argument put forward is that this infrastructure is of national importance and should therefore be specifically enabled. Other submitters have requested that the POP includes specific provisions to discourage the establishment of energy generation structures.

The intention of the provisions for managing the effects of activities on land is to control all activities that may cause potentially significant adverse effects on the environment. Despite activities being of local, regional or national importance, the POP still has an obligation to ensure that the effects of those activities are managed. The POP is arranged so that, should the energy generation industry wish to, an appropriate code of practice for the establishment of energy generation facilities could be developed to enable a more permissive set of rules to be inserted into the POP. At present, submitters have not demonstrated that a suitable code of practice is available.

3.7 Definitions and specific wording

Many submitters have requested that definitions for particular terms within the POP are written, or that existing definitions are altered. Submitters have also requested a number of changes to the specific wording of provisions to improve clarity and readability.

I agree that there are a number of terms that require a greater degree of definition. There are however other terms that don't necessarily need specific definition, either because they have already been defined in the RMA, case law or have a clear common meaning. Terms such as 'effective sediment control' do require some modification to reduce the level of discretion involved in defining those terms on a case by case basis. Where appropriate, wording has been amended to remove the undefined term or a definition has been provided.

3.8 Definition of Highly Erodible Land

Many submitters have requested that the definition of Highly Erodible Land (HEL) is amended. Coupled with this request, a number of submitters have requested that

the map in Schedule A of the POP which shows the location of HEL at a regional scale is inappropriate and should be modified or removed.

The map in Schedule A was developed based on a written definition of HEL developed by John Dymond, who will present evidence in relation to this matter. I agree that the map is of such a scale to be of little use and does not provide certainty to users. It is therefore proposed to delete the map in Schedule A and to instead include a written definition of HEL. The intention was for the map to be used to identify properties that were likely to contain HEL, but to then analyse the land at a property scale (via the WFBP process) to more accurately define the areas of HEL on each property. It is considered that the map no longer needs to sit within the POP and instead a definition to enable identification of HEL at a farm scale be inserted. The definition as proposed in the report has been discussed with a number of submitters and stakeholders at prehearing meetings and has been agreed in principle but for some clarification of specific terms.

3.9 Provision for infrastructure maintenance and upgrade

Submitters, particularly district councils and network utility operators, have made various submissions requesting that the maintenance of network utilities and existing infrastructure occur as a permitted activity. This relates specifically to vegetation clearance and land disturbance. Submitters identify that maintenance of infrastructure, including roads, railways and power lines necessitates a degree of vegetation clearance (pruning and removal of obstructing trees) and minor land disturbance activities such as road maintenance.

Given that maintenance of these activities is generally of a minor nature, and that the cost and time required to obtain resource consents would be considerable for little or no environmental benefit, it is agreed that provision should be made in the POP to enable this activity.

3.10 Management of urban land use

Several submitters have requested that provisions are included in the POP to control the effects of urban subdivision and development on high class soils and on erosion. These requests will be addressed in the hearing for Chapter 3 – Infrastructure, Energy and Waste.

3.11 Other

A range of other submitters request minor or other amendments that do not fall within the overall main issues identified above. Included within these additional submissions are matters that are more appropriately addressed through other chapters of the POP, or are matters that are outside the scope of the POP (costs of consent administration). These matters will be dealt with in the following sections that relate to the submission points in question.

PART FOUR: RECOMMENDATIONS ON SUBMISSIONS

4.1 Recommendation Land 1 Chapter 5 General

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
RURAL WOMEN NEW ZEALAND	380	4	Therefore, RWNZ submits that the Policies and Objectives under heading 5 be amended with words to the effect that only activities causing significant adverse effects are captured by the regulatory regime contained in the Plan and that all relevant rules, flowing from these policies and objectives, be amended accordingly.	Reject
RURAL WOMEN NEW ZEALAND	380	5	We submit that Council has failed to consult adequately with affected stakeholders.	Reject
RURAL WOMEN NEW ZEALAND	380	6	We submit that a projected budget to 2017 be made public and that it sets out staff requirements for the WFBP scheme and the cost of the scheme to the region's ratepayers.	Reject
RURAL WOMEN NEW ZEALAND	380	7	Therefore, we submit that all references to the compulsory imposition of WFBPs be deleted from the One Plan.	Reject
RURAL WOMEN NEW ZEALAND	380	8	Therefore, we submit that Council apply a triple bottom line analysis to the regulations proposed under heading 5, giving social and economic impacts on our community equal weight with actual environmental impacts.	Reject
RURAL WOMEN NEW ZEALAND	380	9	Therefore, we submit that Council avoid basing its decisions on pessimistic precautionary predictions and confine its compulsory regulatory controls to actual and demonstrable significant adverse effects.	Reject

Land management issues are crucial within our region/ rohe. Council relationships and work with landowners is crucial, because many activities that occur on land (and the effects of these activities) are not covered and/ or managed by policies, objectives or rules within the Plan. These include permitted activities that cause pollution problems (eg. farm tracking, inappropriate fertiliser application) and non-point source pollution sources (eg. feedlots, farm tracks). Therefore, Council education and information provision is crucial to facilitating a stewardship ethic amongst landowners, and users of land resources, across the region (see our Chapter 2 submission for further detail).

The Parliamentary Commissioner for the Environment's 2004 report on intensive farming - Growing for Good -discusses some core land management issues. The report highlights many pertinent issues of direct relevance to Council and farming within our rohe. The Commissioner highlights several recommendations for dealing with intensive farming issues:

- We need a dialogue to develop a new vision for the future of farming
- A pan--sector institution to articulate that vision is needed, a foundation or trust that represents all sectors and is outside of government but partnered to it.
- Immediate action is needed to remedy the pollution from farms, to manage the use of nitrogen fertilisers, and to deal with contamination of waterways.
- More investment for research into sustainable farming systems, integrated catchment management and soils is another priority

We urge Council to consider the issues discussed in this report and the initiatives recommended in the report. We are keenly interested in partnership opportunities for dealing with the land management (and associated water management) issues outlined in the report, but relevant to us in our rohe.

Accept in part

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ENVIRONMENTAL WORKING PARTY

ENVIRONMENTAL WORKING PARTY	386	50	We endorse Councils policy for the use of 'whole farm business plans' as a means of achieving the objectives and policies in Chapter 5.	Accept
ENVIRONMENTAL WORKING PARTY	386	51	We ask that Council insert a new policy and/or objective within Chapter 5 to provide a cross reference to Chapter 4 (Te Ao Maori). The policies and objectives of Chapter 4 are important to, and interlinked with, policies and objectives throughout the rest of the Plan. We encourage this approach so that Maori issues and perspectives on environmental management are not isolated to Chapter 4, but made relevant and meaningful through all aspects of the One Plan.	Reject
ALFRED JAMES SIVYER	387	1	No specific decision requested, however submitter notes their opposition to this provision.	Reject
ALFRED JAMES SIVYER	387	2	No specific decision requested, however submitter notes their opposition to this provision.	Reject
LAURA M SIVYER	388	3	No specific decision requested, however submitter notes: If farmers want farm advisory services they are available but it is not up to ratepayers to pay for it.	Reject
ARBOR MANAGEMENT LIMITED	391	2	Arbor Management views the forestry provisions of the current One Plan as regressive. We oppose in part those provisions of the Plan that relate to plantation forestry.	Reject
	X 501	213	ERNSLAW ONE LTD - Support	Reject
	X 520	102	N Z FOREST MANAGERS LTD - Support	Reject
PROPERTY RIGHTS IN NEW ZEALAND INC	393	3	That the whole chapter [Land] be removed or amended to recognise that sediment originates from many sources, not just from landslides. Given that the Regional Council has not carried out a Section 32 monitoring programme of its previous rules, we seek that Council returns to the Status quo and fulfil its obligations. When Council can identify all the sources of sediment loading it will be in a position to regulate if that can be shown to be justifiable.	Reject
ALISON MARGARET MILDON	401	63	Amend policies to introduce a policy to prevent wind farm development on Highly Erodible Land	Reject

	X 525	4	GENESIS POWER LTD - Oppose	Accept
	X 527	380	TARARUA - AOKAUTERE GUARDIANS INC (T A G) - Support	Reject
TARANAKI FISH & GAME COUNCIL	406	4	Retain this section.	Accept
	X 492	64	MINISTER OF CONSERVATION - Support	Accept
POHANGINA VALLEY COMMUNITY COMMITTEE	408	3	The adoption of policies and procedures that coordinate projects aimed at reducing erosion for increased effectiveness and cost efficiency	Accept
POHANGINA VALLEY COMMUNITY COMMITTEE	408	4	The development of plans to address the serious problems posed by high river bank areas that are liable to slip, and that these plans should be integral to all soil erosion schemes.	Accept in part
			Objectives, Policies and Methods	
TE RUNANGA O RAUKAWA INC	424	1	We seek decisions from Horizons when considering submissions on these objectives, policies and methods outlined in Chapter 5 (land) that are consistent with reducing the impact of the accumulative nature of discharges and the serious impact on the coastline and waterways because of the movement of coastal currents on the coastal areas within the Ngati Raukawa tribal boundaries from Rangitikei River to the Kukutauaki Stream south of Te Horo.	Accept in part
L M TERRY	425	9	No specific decision requested, however submitter notes: No restrictions on development of housing on top quality land.	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	23	Delete the word damage and replace with adverse environmental effects, throughout the chapter and a consequential amendment throughout the plan.	Reject
	X 511	125	TRUST POWER LIMITED - Support	Reject
	X 531	41	HORTICULTURE NEW ZEALAND - Support	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	36	Provide consistency in terminology between properties, farming and land use in the context of this section of the regional policy statement.	Accept in part

HOANE TITARI JOHN WI	2	11	All projects have significant impact on hapu and lwi communities and there needs to be recognition that this part of the Horizons Regional Council community have access to all relevant updated information.	Accept in part
WAIKATO DISTRICT HEALTH BOARD - PUBLIC HEALTH UNIT	12	1	The Waikato DHB concurs with and supports Horizons proposal in particular the proposed approach of working with landowners to promote sustainable land-use practices.	Accept
PETER LEFEAUX NEVINS	29	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	46	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
LYNDA JEAN BAINES	40	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 483	2	WILLIAM JOHN FORREST - Support	Reject
	X 502	51	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
GLENDA LUSCOMBE	41	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	52	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
HELEN CLAIRE MCKENZIE	42	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	53	NEW ZEALAND DEFENCE FORCE - Oppose	Accept

			I suggest, if you insist on going ahead with this folly, that:	
CLIFTON HOWARD TOMBLESON	58	6	A: A Horizons staff member be available to inspect and assess whether or not a job presents a risk of erosion and then approve prospective jobs at 24 hours notice, irrespective of the degree of slope, or	Accept in part
			B: that contractors be authorised to assess whether or not a job presents a risk of erosion. That they can then decide if the job goes ahead or not.	
I C H Y T H U S CONSULTING	59	1	That Net Water Balance (NWB) criteria will be given consideration in rules and consenting criteria/conditions.	Reject
ALAN GEORGE & CATHERINE SUSAN DONALDSON	62	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	54	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
	X 509	1	WANGANUI BRANCH OF THE NATIONAL COUNCIL OF WOMEN OF NEW ZEALAND - Oppose	Accept
BARBARA ANNE TAYLOR	66	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	55	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
SALLY JANE & KEITH THOMAS SHERSON	67	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	56	NEW ZEALAND DEFENCE FORCE - Oppose	Accept

PETERSEN FAMILY TRUST	68	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	57	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
KERRY BLACKBURN	69	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	58	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
PETER & MAXENE HOWIE	70	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	59	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
JUDY JOHANSEN	71	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	60	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
PETER DOUGLAS HAWKINS	72	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	61	NEW ZEALAND DEFENCE FORCE - Oppose	Accept

BRIGETTE NEESON	73	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	62	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
ELAINE COUPER	74	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	63	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
MIRIAM JANE TARRANT	75	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	64	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
RODNEY BREARS	76	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	65	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
AJIT SINGH BELLING	78	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	66	NEW ZEALAND DEFENCE FORCE - Oppose	Accept

LYALL WALKER	79	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	67	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
SUSAN CONRAD	80	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	68	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
EDWARD NELSON TARRANT	81	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	69	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
SHERYL YVONNE FRASER	82	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	70	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
GENEE LEONIE LUDLAM	83	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	71	NEW ZEALAND DEFENCE FORCE - Oppose	Accept

AMY COUPER	84	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	72	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
LANCE & MANNIX HOUPAPA	85	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	73	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
GEOFF & JOSE HEALE	86	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	74	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
ANNIE CARMICHAEL	87	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	75	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
GRAHAM CARMICHAEL	88	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	76	NEW ZEALAND DEFENCE FORCE - Oppose	Accept

EVELYN HEALE	90	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	77	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
MERLE HEMOPO	91	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	78	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
SEAN ROBERT TRAFFORD & ALEXANDRA ROGERS	92	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	79	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
KEN MARSHALL	95	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with Affected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	80	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
BERT JUDD	96	8	Cut all trees and don't plant again, we have big problems [Manawatu River mouth & Waitarere forestry].	Reject
B C & J E GOWER PARTNERSHIP	106	1	That you give consideration to the difference in Land Use of the Parapara by changing the rules regarding scrub regrowth and Land Use.	Reject
B C & J E GOWER PARTNERSHIP	106	2	Amendments to Heading 5 Only activities with significant negative effects under normal wet conditions be regulated and the relevant rules amended.	Reject

PETER & GAIL GOWER	119	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 483	1	WILLIAM JOHN FORREST - Support	Reject
	X 495	83	RUAPEHU DISTRICT COUNCIL - Support	Reject
	X 502	18	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
GARRY BURGESS DICKIE	120	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 495	84	RUAPEHU DISTRICT COUNCIL - Support	Reject
	X 502	19	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
G S HALL	128	1	Removal of Chapter 5 of the Policy Statement and introduce relevant policies and objectives after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 495	85	RUAPEHU DISTRICT COUNCIL - Support	Reject
	X 502	20	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
S GALL	129	1	Removal of Chapter 5 of the Policy Statement and introduce relevant policies and objectives after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 495	86	RUAPEHU DISTRICT COUNCIL - Support	Reject
	X 502	21	NEW ZEALAND DEFENCE FORCE - Oppose	Accept

N COLLIER	130	1	Removal of Chapter 5 of the Policy Statement and introduce relevant policies and objectives after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 502	22	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
ROSS CHARLES & JUSTINE FRANCES WALKER	131	1	Removal of Chapter five of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	23	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
KURUA FARMS	132	1	Removal of Chapter five of the Policy Statement as I believe this to be much to general and needs much consultation we must be able to continue development for the benefit of the region.	Reject
	X 502	24	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
CLIFTON HOWARD TOMBLESON	133	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	26	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
CLIFTON HOWARD TOMBLESON	133	4	I submit that the scope of this One Plan needs to be looked at again and bought back into line with the core business of Horizons. Leave the managing of the farm businesses to the farmers. We have farmed for many years and know our land. The contractors in this area are also very experienced, far more so than horizons staff.	Reject
PAUL ALEXANDER MC GLADE & EUNICE ROBIN WEIR	134	1	Removal of Chapter five of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with affected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject

	X 502	25	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
R T WALLER	135	1	Removal of Chapter 5 of the Policy Statement and introduce relevant policies and objectives after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 502	27	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
N C TYLEE	136	1	Removal of Chapter 5 of the Policy Statement and introduce relevant policies and objectives after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 502	28	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
GEORGE ALEXANDER HOPEFAL GOWER	138	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after sufficient evaluation and consultation with effected parties.	Reject
	X 502	29	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
GORDON ROBERT GOWER	146	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	30	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
IVAN BRENT & ROSEMARY LYNETTE WATTS	150	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	31	NEW ZEALAND DEFENCE FORCE - Oppose	Accept

RUAPEHU DISTRICT COUNCIL	151	48	(a) Council is concerned that the retiring land in the Ruapehu District will affect the viability of the individual farmer and support industries, the local economy and the rating base.	Reject
	X 481	113	PALMERSTON NORTH CITY COUNCIL - Support	Reject
RUAPEHU DISTRICT COUNCIL	151	49	(b) Council submits that landowners receive significant benefits from Farm Plans such as not needing to apply for resource consents. This should be used to offset the price of developing the whole Farm Plan rather than burdening ratepayers with the cost of the plan. Alternatively a loan or Regional Council rating subsidy could be offered to attract farmers to undertake Whole Farm Plans.	Reject
	X 481	114	PALMERSTON NORTH CITY COUNCIL - Support	Reject
RUAPEHU DISTRICT COUNCIL	151	50	(c) Farm Plans need to be introduced over time to match resource levels. Farmers who do not receive this resource allocation should not be penalised. Phasing in of Farm Plans needs to be undertaken under a realistic time frame, without triggering resource consent requirements.	Accept in part
	X 481	115	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
RUAPEHU DISTRICT COUNCIL	151	52	(e) Stormwater does not need treating to first flush standards in a rural area.	
	X 481	117	PALMERSTON NORTH CITY COUNCIL - Support	
RUAPEHU DISTRICT COUNCIL	151	53	(f) Councils are exempt from application of resource consents for two years to fund the development a code of practice for roading maintenance works to enable these activities to be allowed as permitted activities for their particular parent types.	Reject
	X 481	118	PALMERSTON NORTH CITY COUNCIL - Support	Reject
RUAPEHU DISTRICT COUNCIL	151	54	(g) That Highly Erodible Land is defined in a scientific and robust manner, and the slope is not used as a definition as it is too blunt an instrument.	Accept in part
	X 481	119	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
RUAPEHU DISTRICT COUNCIL	151	55	(h) The Map depicting Highly Erodible Land is not of sufficient quality to be useful and must be withdrawn.	Accept in part
	X 481	120	PALMERSTON NORTH CITY COUNCIL - Support	Accept

	X 522	122	MERIDIAN ENERGY LIMITED - Support	Accept
	X 531	43	HORTICULTURE NEW ZEALAND - Support	Accept
RUAPEHU DISTRICT COUNCIL	151	56	More Discussion on Highly Erodible Land in relation to Transport is under the Rules Section.	Reject
	X 481	121	PALMERSTON NORTH CITY COUNCIL - Support	Reject
ON TRACK (N Z RAILWAYS CORPORATION)	161	11	ONTRACK(New Zealand Railways Corporation) supports Horizons Regional Council's Proposed One Plan statement that:- "From analysis of the February storm, we know that on steep land, forest cover reduces slipping by about 90% when compared to grass."	Accept
VELMA JUNE SIEMONEK	167	1	Remove chapter 5 of the policy statement and replace it by a variation with a chapter that fulfils obligation as defended in Section 59 of the RMA being a complete overview derived from sound monitoring as set down in section 35 of the RMA	Reject
	X 502	32	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
KARL SPLITT	169	1	Removal of Chapter 5 of the Policy Statement and introduce relevant policies and objectives after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 502	33	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
KEVIN JOHN SIEMONEK	170	1	Removal of Chapter 5 of the Policy Statement and introduce relevant policies and objectives after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 502	34	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
P JOHN CHURMAN	171	1	Removal of Chapter 5 of the Policy Statement and introduce relevant policies and objectives after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject

	X 502	35	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
TARARUA DISTRICT COUNCIL	172	23	<p>[Particular reference to Policies 5-3 and 5-4] - Withdraw the whole plan; or - Introduce a new policy stating that maintenance works, emergency response and minor improvements for the roading network and infrastructure recognised under Policy 3-1 will generally be allowed.</p>	Accept in part
	X 481	294	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 498	14	TRANSIT NEW ZEALAND - Support	Accept in part
JILESEN CONTRACTORS LTD	173	1	<p>Amend the Policy Statement by adding a further paragraph: The Council will as part of its Plan create rules that are easily understood and are transparent to all affected parties. The Council will develop a rapid response process for all consents other than major consents that can be processed on site, within 24 hours of application at no cost to the applicant, thereby recognising the public good of the applicants actions, and in keeping with Section 36 4(b) 1 & 2 of the RMA.</p>	Accept in part
LUKE CHRISTOPHER GREEN	183	1	<p>Removal of Chapter 5 of the Policy Statement and introduce relevant policies and objectives after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.</p>	Reject
	X 502	36	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
DEAN SADDLER GOWER	184	1	<p>Removal of Chapter 5 of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.</p>	Reject
	X 502	37	NEW ZEALAND DEFENCE FORCE - Oppose	Accept

HELEN MARGARET IRWIN LILEY	191	1	Removal of Chapter 5 and provide a much more accurate evaluation and consultation of the local economy. It is clearly apparent to those of us who live here that we can attend to environmental protection and by continuing to exist, provide a very useful safety valve for other farming areas prone to ravages such as drought.	Reject
RON & SANDRA CAREY	193	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	38	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
NEVILLE FRANCIS WHEELER	194	1	Removal of Chapter (5) Five of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	39	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
MALCOLM FARMING LTD	195	1	I believe that the plan should be immediately withdrawn, and if it is to be redrawn to further investigate and take on board some practical experiences of farmers, farmers to get involved.	Reject
SPLIT ROCK STATION LTD	199	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	40	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
SANDRA ROGERS	206	2	In general opposes retirement of steeper country due to effects on the economy of the region. No decision specifically expected.	Reject
SANDRA ROGERS	206	3	Unspecified concerned at retirement of HEL land into forestry effect on the economy?	Reject

NEIL & ANNIE PETERSEN	210	1	Removal of Chapter 5 of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	41	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
TREVOR OWEN COUPER	212	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	42	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
DAVID HAROLD PORRITT	215	1	Amend the Policy Statement by adding a further paragraph: The Council will as part of its Plan create rules that are easily understood and are transparent to all affected parties. The Council will develop a rapid response process for all consents other than major consents that can be processed on site, within 24 hours of application at no cost to the applicant, thereby recognising the public good of the applicants actions, and in keeping with Section 36 4(b) 1 & 2 of the RMA	Reject
TANIA FAYE BOLTON	216	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	43	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
ROBERT GEORGE & COLLEEN MARY DONALDSON	219	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	44	NEW ZEALAND DEFENCE FORCE - Oppose	Accept

LIONEL WEST IN ASSOCIATION WITH PROPERTY RIGHTS IN NZ	220	2	If the general public demand retirement of land then the general public must pay not through rates - compensation - not provided for in the One Plan.	Reject
LIONEL WEST IN ASSOCIATION WITH PROPERTY RIGHTS IN NZ	220	4	No decision requested but submitter appears to want council to consider if it is applying the need for consents unnecessarily to some properties.	Reject
MICHAEL PETERSEN - P E T C O CONTRACTS LTD	229	1	Amend the Policy Statement by adding a further paragraph: The Council will as part of its Plan create rules that are easily understood and are transparent to all affected parties. The Council will develop a rapid response process for all consents other than major consents that can be processed on site, within 24 hours of application at no cost to the applicant, thereby recognising the public good of the applicants actions, and in keeping with Section 36 4(b) 1 & 2 of the RMA.	Accept in part
TREVOR ALLEN JOHNSON	233	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	45	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
PALMERSTON NORTH CITY COUNCIL	241	41	That Horizons adopt accelerated erosion as one of its key issues.	Accept
	X 500	96	TARARUA DISTRICT COUNCIL - Support	Accept
	X 507	96	MANAWATU DISTRICT COUNCIL - Support	Accept
	X 515	96	HOROWHENUA DISTRICT COUNCIL - Support	Accept
	X 517	227	RANGITIKEI DISTRICT COUNCIL - Support	Accept
	X 532	96	WANGANUI DISTRICT COUNCIL - Support	Accept
RUAPEHU FEDERATED FARMERS OF NEW ZEALAND INC	246	5	Identify HEL where there are more than minor adverse effects and work with land owners and occupiers affected.	Accept in part

SCOTT GOWER	254	3	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	81	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
TREVOR & WENDY SCHROEDER	255	1	No specific decision requested but questions if the Regional Council is going to pay the farmer a production loss for retired land annually as we the farmer pay rates on this land. With no production on this land no rates can be paid.	Reject
POWERCO LIMITED	272	13	I1 - Chapter 5 objectives and policies to remain unchanged.	Accept in part
	X 511	122	TRUST POWER LIMITED - Oppose	Accept in part
HOROWHENUA DISTRICT COUNCIL	280	24	[Reference to Policy 5-3 and 5-4] Introduce a new policy stating that maintenance works, emergency response and minor improvements for the roading network and infrastructure recognised under Policy 3-1 will generally be allowed.	Accept in part
	X 481	385	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 498	12	TRANSIT NEW ZEALAND - Support	Accept in part
WANGANUI DISTRICT COUNCIL	291	46	Introduce rules or other mechanisms that regularise the actions identified in whole farm plans.	Reject
	X 481	506	PALMERSTON NORTH CITY COUNCIL - Support	Reject
WANGANUI DISTRICT COUNCIL	291	56	[Particular reference to Policy 5-3 and 5-4] - Withdraw the whole plan; or - Introduce a new policy stating that maintenance works, emergency response and minor improvements for the roading network and infrastructure recognised under Policy 3-1 will generally be allowed.	Accept in part
	X 481	516	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 525	260	GENESIS POWER LTD - Support in Part	Accept in part

N Z FOREST MANAGERS LTD	319	1	NZFM generally supports the Horizons MW Regional Council's (the Council) proposed methods for managing land management issues within the region.	Accept
	X 501	136	ERNSLAW ONE LTD - Support	Accept
N Z FOREST MANAGERS LTD	319	2	The recognition that future agricultural practices have the potential to increase the rate of land and soil damage if natural limitations of the land are not taken into account is particularly supported.	Accept in part
	X 501	137	ERNSLAW ONE LTD - Support	Accept in part
KAWAUTAHI FARMS LTD	321	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	47	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
J N TURNER	322	1	Removal of Chapter 5 of the Policy Statement and introduce relevant policies and objectives after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 502	48	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
G P & C S DEMPSEY	324	1	Removal of Chapter 5 of the Policy Statement and introduce relevant policies and objectives after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 502	49	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
NEW ZEALAND DEFENCE FORCE	330	10	1. Amend Chapter 5 to address all land in a similar fashion. Further details are included below.	Accept in part
NEW ZEALAND DEFENCE FORCE	330	11	OR 3. Amend Chapter 5 to confirm that the policies apply only to farmland.	Reject

MANAWATU DISTRICT COUNCIL	340	35	Introduce a new policy stating that maintenance works, emergency response and minor improvements for the roading network and infrastructure recognised under Policy 3-1 will generally be allowed.	Accept in part
	X 481	591	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 498	13	TRANSIT NEW ZEALAND - Support	Accept in part
DIGBY MILNE BRICE	345	1	Removal of Chapter 5 (FIVE) of the Policy Statement and introduce relevant objectives after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	50	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
RANGITIKEI DISTRICT COUNCIL	346	23	[Particular reference to Policies 5-3 and 5-4] Introduce a new policy stating that maintenance works, emergency response and minor improvements for the roading network and infrastructure recognised under Policy 3-1 will generally be allowed.	Accept in part
	X 481	728	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 498	11	TRANSIT NEW ZEALAND - Support	Accept in part
WANGANUI BRANCH OF THE NATIONAL COUNCIL OF WOMEN OF NEW ZEALAND	351	2	No specific decision requested but the only point NCWNZ, Wanganui, would question is that none of the Plan will be mandatory at present. This may be necessary in future, particularly in the case of erosion on hill country, which is a major problem in this area. The Wanganui Branch suggest that the Council make it clear that the requirements will be made mandatory, if effective improvement is not seen within a specified short time.	Reject
DARRIN BROWN	352	1	Amend the Policy Statement by adding a further paragraph: The Council will as part of its Plan create rules that are easily understood and are transparent to all affected parties. The Council will develop a rapid response process for all consents other than major consents that can be processed on site, within 24 hours of application at no cost to the applicant, thereby recognising the public good of the applicants actions, and in keeping with Section 36 4(b) 1 & 2 of the RMA	Reject

JOHN BATLEY	355	7	Inequalities in funding are a concern. Those properties involved in the SLUI Project are funded by taxpayer and ratepayer assistance whereas those who apply for consents directly pay all the costs. This will mean another increase in rates already running at extremely high levels. Parallel circumstances occur at present where many properties not receiving pest control by Horizons, fund properties that are.	Reject
HORTICULTURE NEW ZEALAND	357	49	Decision Sought: Include a definition for accelerated erosion as follows: Soil erosion occurring at a rate exceeding the rate of natural weathering, and commonly due to human activity.	Accept in part
MERIDIAN ENERGY LIMITED	363	53	Meridian opposes Chapter 5 and requests it is amended as follows or similar: Delete Schedule A; or Amend Schedule A to more accurately map the land that is highly erodible and include details as to which properties with the Region it affects Any consequential amendments necessary to give effect to this submission	Accept in part
	X 511	123	TRUST POWER LIMITED - Support	Accept in part
	X 531	42	HORTICULTURE NEW ZEALAND - Support	Accept in part
MERIDIAN ENERGY LIMITED	363	54	Meridian opposes Chapter 5 and requests it is amended as follows or similar: Amend the objectives and policies to enable other activities on highly erodible land, subject to appropriate management plans. Any consequential amendments necessary to give effect to this submission	Accept in part
	X 502	17	NEW ZEALAND DEFENCE FORCE - Support	Accept in part
	X 511	124	TRUST POWER LIMITED - Support	Accept in part
J M & L C WHITELOCK & B J & C J WHITELOCK	371	6	Request - Attention to Rural Residential subdivision policies and criteria.	Reject

MINISTER OF CONSERVATION	372	19	Provide interpretation of the term 'sustainable land management' and its application either as an explanatory note, in the Glossary, or with reference to the outcomes sought in Table 5.6.	Reject
	X 531	40	HORTICULTURE NEW ZEALAND - Oppose in Part	Accept in part
	X 533	8	FEDERATED FARMERS OF NEW ZEALAND INC - Support	Reject
TARANAKI / WHANGANUI CONSERVATION BOARD	374	10	The plan should be amended to clearly specify SLM target. Chapter (5)	Reject
TARANAKI / WHANGANUI CONSERVATION BOARD	374	8	oThis section should be cross referenced to other chapters with relevant objectives and policies.	Accept in part
RURAL WOMEN NEW ZEALAND	380	10	Therefore, we submit, based on our experience of the current situation, that Council does not have the resources to provide the practical, cost effective and timely delivery of such a scheme.	Reject
	X 483	4	WILLIAM JOHN FORREST - Support	Reject
RURAL WOMEN NEW ZEALAND	380	3	RWNZ submits that monitoring and forecasting of environmental effects is a good that accrues to the community and if the community desires this, then the community should share the cost of such efforts.	Accept in part
	X 502	16	NEW ZEALAND DEFENCE FORCE - Support	Accept in part

NGA PAE O RANGITIKEI	427	48	<p>Land management issues are crucial within our region/ rohe. Council relationships and work with landowners is crucial, because many activities that occur on land (and the effects of these activities) are not covered and/ or managed by policies, objectives or rules within the Plan. These include permitted activities that cause pollution problems (eg. farm tracking, inappropriate fertiliser application) and non-point source pollution sources (eg. feedlots, farm tracks). Therefore, Council education and information provision is crucial to facilitating a stewardship ethic amongst landowners, and users of land resources, across the region (see our Chapter 2 submission for further detail).</p> <p>The Parliamentary Commissioner for the Environment's 2004 report on intensive farming - Growing for Good -discusses some core land management issues. The report highlights many pertinent issues of direct relevance to Council and farming within our rohe. The Commissioner highlights several recommendations for dealing with intensive farming issues:</p> <ul style="list-style-type: none"> - We need a dialogue to develop a new vision for the future of farming - A pan--sector institution to articulate that vision is needed, a foundation or trust that represents all sectors and is outside of government but partnered to it. - Immediate action is needed to remedy the pollution from farms, to manage the use of nitrogen fertilisers, and to deal with contamination of waterways. - More investment for research into sustainable farming systems, integrated catchment management and soils is another priority <p>We urge Council to consider the issues discussed in this report and the initiatives recommended in the report. We are keenly interested in partnership opportunities for dealing with the land management (and associated water management) issues outlined in the report, but relevant to us in our rohe.</p>	Accept in part
NGA PAE O RANGITIKEI	427	50	We endorse Councils policy for the use of 'whole farm business plans' as a means of achieving the objectives and policies in Chapter 5.	Accept

NGA PAE O RANGITIKEI	427	51	We ask that Council insert a new policy and/or objective within Chapter 5 to provide a cross reference to Chapter 4 (Te Ao Maori). The policies and objectives of Chapter 4 are important to, and interlinked with, policies and objectives throughout the rest of the Plan. We encourage this approach so that Maori issues and perspectives on environmental management are not isolated to Chapter 4, but made relevant and meaningful through all aspects of the One Plan.	Reject
KIRSTEN ANN BRYANT	429	1	I request the chapters 5 be withdrawn from the Proposed One Plan until such time that the science, practicality, sustainability and impact of the proposed policies and rules on the rural community be adequately evaluated and assessed. I request that horizons show how they intend to implement and fund the ideals and rules in chapters 5.	Reject
	X 483	3	WILLIAM JOHN FORREST - Support	Reejct
MANAWATU BRANCH OF N Z GREEN PARTY	433	28	Clarification as to: What the actual target is for HEL areas; and Whether the WFBP operates as a consent and what within a plan would trigger a more regulatory approach being needed.	Reject
MANAWATU BRANCH OF N Z GREEN PARTY	433	39	Add any other method(s) which contributes to environmental enhancement of the landscape. These may be incorporated into Codes of Practice and Sustainable Land Use Initiatives.	Reject
BRUCE & PAMELA HODGES	436	3	I also think if this is what the Council wants, it should look at doing the fencing, planting of trees, and perform the maintenance of both. It should also pay the farmer yearly market rental for the land lost, the Council can earn money from the carbon credits for this. They should also look at doing the same for what they call eroding hill country.	Reject
B W TYLEE ON BEHALF OF PROPERTY RIGHTS IN NEW ZEALAND	439	1	we object and demand that this title [Highly Erodible Land - HEL]be struck from the plan forth with.	Accept in part

B W TYLEE ON BEHALF OF PROPERTY RIGHTS IN NEW ZEALAND	439	2	To summarise we believe that there is a lot more work to be done before any decisions can be made on the way we handle these erodible land formations. We know that time is of the essence but if we get it wrong and have to undo all the work that is done then we haven't taken the right options in the first place and we displace a lot of farming families and breached those families property rights that will be contributing to the national economy and for no reason in the first place based on a political agenda rather than sound science.	Reject
LANDLINK LTD	440	27	Whole Farm Business plans are supported alongside the implementation of 'farm consents'.	Accept
DIANA BAIRD	443	16	Classification of HEL Therefore, my submission is that Horizons return to the previous well established, well recognised and understood Land Classification system, breaking it down further where required	Accept in part
DAVID AISLABIE ON BEHALF OF THE WHANGANUI BRANCH OF THE GREEN PARTY	451	3	No specific decision requested but submits that the Regional Council should investigate the implementing of a differential sustainable farming rate.	Reject
DAVID AISLABIE ON BEHALF OF THE WHANGANUI BRANCH OF THE GREEN PARTY	451	4	No specific decision requested but submits that Horizons should adopt a proactive role in facilitating this process [carbon credits] and work with groups of interested farmers.	Accept in part
ECOLOGIC FOUNDATION	456	3	The council should uphold the proposed definitions and maps of highly erodible land.	Accept in part
DON STEWART	462	1	The submitter does not request a decision, but notes: - Farmers have been the back bone of the New Zealand economy for years and don't like being told by Horizons what and how to do it. - The mere fact you talk about putting restrictions on land of greater than 20 degree slopes proves Horizons lacks any understanding of the nature of farming, most of our fit healthy breeding stock graze on country that is far steeper than that.	Reject

Summarise submission points

- (a) Several submitters have requested that only activities with significant negative effects are regulated and the relevant rules amended accordingly.
- (b) Submitters 291/46 and 351/2 have requested that WFBPs are made compulsory or are reinforced with regulation. Other submitters request that any reference to WFBPs being compulsory is removed from the POP.
- (c) Some general submission points were made in relation to the costs and time associated with applying for resource consents. These submitters, including 352/1 and 58/6, propose the inclusion of a 'fast-track' resource consent process. Submitters also raise concerns about the costs to Horizons of administering the provisions of the POP.
- (d) Submitters 386/51 and 427/51 promote the inclusion of clearer cross-references to other chapters within the POP. Specifically this includes references to the Te Ao Maori chapter.
- (e) The definition of Highly Erodible Land was raised by a number of submitters (eg. 151/55 and 363/53) as a concern, principally in relation to the appropriateness of the maps in Schedule A. One submitter, 456/3 requested that the existing maps and definition of Highly Erodible land is upheld. Related to this issue is the use of the term 'Highly Erodible Land'. Concern has been expressed by submitters (439/1) and at pre-hearing meetings that the acronym HEL is not favourable.
- (f) Submitters have requested specific changes to wording and definitions within the chapter. These will be addressed at the relevant sections of this report.
- (g) A number of submitters have made submissions in general opposition to the chapter but no specific relief is sought (387/1, 220/4).
- (h) Submitters support a greater role of Horizons in undertaking education methods (451/4, 408/4 and 386/48).
- (i) Three territorial authorities request that the land chapter is amended to make provision for the maintenance of infrastructure as a permitted activity, particularly in relation to vegetation clearance and land disturbance (151/53, 291/56 and 340/35).
- (j) A number of submitters provide general support for the provisions of the Land chapter. Some submission points are not clear as to whether they support or oppose the specific provisions however as their recommendation is consistent with the current approach of the POP, these points have been interpreted as being generally in support (eg. 408/3 and 246/5). Included are submission points that offer general support to the WFBP method.

- (k) A large number (approximately 71) of submitters (examples are 73/1 and 74/1) have expressed concern in relation to the cost benefit analysis undertaken as part of the preparation of the provisions of the Land chapter. Submitters do not request any relief other than that the provisions in Chapter 5 are withdrawn until a full evaluation and consultation has been completed in order to develop other provisions. The reasoning for the objections is that there is allegedly no proof that Highly Erodible land exists and that the 'allegation' of land being highly erodible will have major social, economic and cultural impacts on the region. Some submitters also raise concerns about the scientific foundation of the Council's approach (439/2).

Evaluation

Many of the topic areas identified above are more appropriately dealt with in later sections of this report, particularly those relating to specific definitions or wording. While I comment on some of the matters here, the remainder will be addressed in the sections of this report that relate to the specific provisions referred to in the submission points.

Costs of administering the POP and the cost structures for processing resource consents are matters that sit outside the POP, These matters are more appropriately addressed through the Long Term Council Community Plan (LTCCP) and the Annual Plan processes where the allocation of Council resources are considered.

Submitters requesting that Whole Farm Business Plans (WFBPs) are either made compulsory or are amended to not be compulsory will be addressed in more detail in later sections of this report. To summarise those recommendations, WFBPs are a non-regulatory method that sits outside the POP. The POP simply 'borrows' the WFBP method, recognising that the outcomes achieved by WFBPs are consistent with the outcomes intended by the POP. Landowners should not be forced to adopt the WFBP approach as there may be situations where that approach is not acceptable or appropriate. The POP includes rules to control activities that will affect erosion so that, should WFBPs not be adopted, the effects on the environment are controlled.

In relation to the provisions of clearer cross-references within the chapter, specifically in relation to cross-references to the Te Ao Maori chapter, I consider that this is unnecessary in Chapter 5 – Land. The Te Ao Maori chapter makes it clear that the objectives and policies of that chapter are addressed throughout the rest of the POP via specific provisions in relevant chapters. Specifically, Table 4.1 in Chapter 4 – Te Ao Maori specifically identifies provisions that have been placed in the POP (both RPS and RP) to give effect of the objectives and policies of this chapter. An example is (l) which relates to farm management plans (specific reference to the rules in Chapter 12 relating to land use activities). The rules of Chapter 12 provide for protection of matters of importance to Maori both directly (through specific standards relating to archaeological sites, koiwi, etc) and indirectly (through the management of natural resources, including water quality). I consider that providing further reference to the Te Ao Maori chapter within the POP would provide little assistance to users. Additionally, any applicants for resource consent, and the Council when considering resource consent applications, are required to have regard to the provisions of the RPS pursuant to s104 of the Act.

104 Consideration of applications

(1) *When considering an application for a resource consent and any submissions received, the consent authority must, subject to Part 2, have regard to—*

(a) any actual and potential effects on the environment of allowing the activity; and

(b) any relevant provisions of—

(i) a national policy statement;

(ii) a New Zealand coastal policy statement;

(iii) a regional policy statement or proposed regional policy statement;

(iv) a plan or proposed plan; and

(c) any other matter the consent authority considers relevant and reasonably necessary to determine the application.

S104 ensures that the relevant objectives and policies of the Te Ao Maori chapter are given regard to rather than it being a 'redundant' chapter in the POP.

The definition and extent of HEL will be addressed in later sections of my report. However I note at this point that the definition of HEL does need to be clarified and it is recognised that the map of HEL in Schedule A of the POP is of little practical use to plan readers due to its scale. It is proposed to replace the map in Schedule A with a written definition of HEL.

The use of the term 'Highly Erodible Land' or 'HEL' has been identified as being inappropriate, principally because of the perceived connotations associated with the anagram, particularly when referring to areas of land or the type of land within which a particular property is described as being in. It is therefore proposed to amend the term to Highly Erodible Country (HEC). While there may be some connotations when the proposed anagram is used as a word, when referring to land or areas of land, it may be considered more appropriate than the former term. To minimise confusion resulting from a change to terminology partway through the submission and hearing process, and to avoid adopting a potentially unfavourable term prior to consideration of it by submitters, I propose to continue to use the current term within this report.

The matter of whether a s32 evaluation, including consideration of the costs and benefits of the policies, rules and other methods, has been undertaken by Horizons in developing the provisions of the POP has, to a large degree, been addressed in the Planning Report by Helen Marr and associated expert evidence of John Maassen, Phillip Percy and Bettina Anderson for the Overall One Plan hearing. I will not repeat the recommendations and expert evidence presented at that hearing other than to draw attention to that evidence at relevant points within this report.

Submitters that request that amendments are made to the provisions of Chapter 5 in relation to a failure to consider the costs and benefits of the proposed provisions provide little in the way of support for their requests. The majority of the submissions call for

Chapter 5 to be withdrawn on the basis that there is no scientific evidence to support the identification of HEL, especially in the Ruapehu district. The submissions do not provide alternative evidence to indicate that the position Horizons has adopted in the POP is incorrect, nor do they provide any analysis or criticism of the numerous documents prepared by and for Horizons to inform the development of the provisions surrounding HEL and WFBPs.

Greg Carlyon, John Dymond, Alec McKay, Jon Roygard, Allan Cook, Allan Kirk and Lachlan Grant will all present evidence which will outline the investigations, reporting and processes that took place to develop not only the definition of HEL, but also the whole Sustainable Land Use Initiative (SLUI) of which the WFBPs are a component. This evidence will describe how HEL is defined and will explain why certain areas of the Region are more likely to be classified as HEL than others. The evidence shows that there has been a long and comprehensive development programme that has informed both the SLUI and the Land chapter of the POP. I consider that this evidence demonstrates that there has been a thorough evaluation of the sources and causes of accelerated erosion in the Region and that there has been careful consideration of the costs and implications of the SLUI programme and the associated provisions in the POP.

As discussed in evidence for the Overall One Plan hearing, submitters that wish to raise concerns with the s32 analysis and reporting undertaken by Horizons must direct their submission at the substantive matters in the Plan and support their argument with any alleged weakness in the s32 evaluation. The Act intends that the Hearing Panel will make a decision based on the information that submitters present in their submissions and at hearings to support any changes to the provisions of the POP. Where submitters do not offer alternatives to the existing provisions, the Hearing Panel is restricted in their ability to make any amendments to satisfy the concerns of the submitters in their decision. Furthermore, it is not appropriate that submitters call simply for the removal of the whole POP or entire sections of it only on the basis that the submitters consider that a s32 evaluation has not been completed (please see the s42A Reports of John Maassen and Phillip Percy for more discussion on this point). An alternative to the proposed provisions must be provided with supporting evidence to justify why the proposed amendment is more appropriate for achieving the purpose of the Act (in respect of objectives) or for achieving the objectives (in the case of policies, rules and other methods).

My reading of submissions is that none provide suitable support for alternatives to the currently proposed provisions, and do not specify a relief sought that is appropriate for achieving the purpose of the Act. For this reason, I recommend that those submissions requesting that Chapter 5 be withdrawn or amended on the grounds that suitable evaluation or consultation has not been completed should be rejected.

The request by submitters to make provision for maintenance of infrastructure will be addressed in later sections of this report. It will be recommended that there are some changes made to the POP to enable maintenance activities associated with existing infrastructure as the effects of these activities are likely to be minimal and the on-going maintenance of infrastructure serving the community is important for the on-going well-being of the community.

4.1.3 Recommendation

Reject submissions requesting Chapter 5 is removed or amended due to lack of evaluation and consultation.
Reject submissions requesting better cross-links between the Land and Te Ao Maori chapters in the POP.
Accept in part submissions seeking changes to the definition of HEL.
Accept in part submissions requesting that provisions in the POP only control activities which cause adverse effects.
Accept in part submissions requesting maintenance associated with infrastructure is permitted.
Reject those submissions stating general opposition to the provisions of the Land chapter.
Accept submissions providing general support to the Land chapter provisions.

4.1.3.1 Recommended changes to provision

All recommended changes to provisions related to the submission points above will be addressed in the specific sections of the report to which they are addressed.

4.2 Recommendation Land 2 Chapter 5 Paragraph 5.1 Scope

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
WATER AND ENVIRONMENTAL CARE ASSN INC	311	9	5.1 Scope and Background is supported.	Accept
MANAWATU ESTUARY TRUST	312	61	5.1 Scope and Background is supported.	Accept
GEORGE & CHRISTINA PATON	313	61	5.1 Scope and Background is supported.	Accept
FEDERATED FARMERS OF NEW ZEALAND INC	426	22	Reword 5.1 paragraph two to read: Agriculture, particularly pasture-based farming is the foundation of the Region's economy and is one of the key elements that have defined our social and economic wellbeing and defined the natural character of the rural landscape. However, inappropriate land management practices can to lead to adverse effects of accelerated erosion. Land management practices must be managed in a way that takes the natural limitations of the land into account to reduce the effects of accelerated erosion. (or words to this effect)	Reject
	X 487	46	FONTERRA CO-OPERATIVE GROUP LIMITED - Support	Reject
DIANA BAIRD	443	9	Paragraph 1 Therefore, my submission is that Horizons amend this section to read "often" rather than "mainly" from activity.	Reject
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	14	Seek to have soil contamination (particularly of Cadmium) listed as an important issue, and policy, objectives and rules developed accordingly	
	X 531	44	HORTICULTURE NEW ZEALAND - Oppose	Support

4.2.1 Summarise submission points

- (a) Submitters have requested that specific wording of this section of the POP is amended. Submitter 443/9 requests that the term 'mainly' in the first sentence of the section is amended to 'often'. Submitter 426/22 seeks to have the second paragraph reworded to refer to natural character of the landscape and to remove the direct reference to the agricultural sector.
- (b) Submission 460/14 seeks to have soil contamination provisions, particularly Cadmium, introduced into the Land chapter.
- (c) General support to the section.

4.2.2 Evaluation

Amending 'mainly' to 'often' in the first sentence would seem to result in little change to the purpose of the statement. It is implicit that land management issues stem from the effects of human activities as without human activities there would be minimal land management issues. I therefore consider it appropriate to retain the current wording.

Submitter 426/22 seeks several changes to the wording in the second paragraph. Including a further reference to the contribution agriculture plays to the economy of the region within the same sentence is not considered necessary. The first sentence of the second paragraph already states that agriculture 'is the foundation of the Region's economy'. I agree that impact on natural resources is not entirely the result of agricultural activities, however this paragraph should be read in conjunction with the first paragraph of the section, which provides statements related to land uses (human activities) in general. The second paragraph recognises that agricultural activities are a major land use activity in the Region and that the practices associated with that type of land use need to be specifically managed. I do not consider that the paragraph unfairly attributes responsibility to the agricultural sector or that all individuals in the agricultural sector contribute to the accelerated erosion issue. Rather it simply states the current situation. Therefore I do not consider that the wording of the paragraph needs to be modified.

The management of soil contamination is not a matter to be addressed in the Land chapter. This is more appropriately addressed through the control of discharges to land, including the use of fertilisers. Therefore, I do not consider it necessary to make any amendments to the Land chapter in relation to soil contamination.

4.2.3 Recommendation

- Reject the submission requesting changes to the first sentence of the section.
- Reject the submission requesting inclusion of soil contamination provisions into the Land chapter.

Reject the submission requesting modifications to the second paragraph of the section.

4.2.3.1 Recommended changes to provision

None.

4.3 Recommendation Land 3 Chapter 5 Paragraph 5.1.1 Chapter Content

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
WATER AND ENVIRONMENTAL CARE ASSN INC	311	10	5.1.1 Chapter Content is Supported.	Accept
MANAWATU ESTUARY TRUST	312	2	5.1.1 Chapter Content is Supported.	Accept
GEORGE & CHRISTINA PATON	313	2	5.1.1 Chapter Content is Supported.	Accept
FEDERATED FARMERS OF NEW ZEALAND INC	426	24	Delete the term "agricultural practice" and replace with "land management practice".	Accept in part
	X 531	45	HORTICULTURE NEW ZEALAND - Support	Accept in part

4.3.1 Summarise submission points

- (a) Submitter 426/24 requests that the term 'agricultural practice' is replaced with 'land management practices'.
- (b) General support.

4.3.2 Evaluation

Paragraph one describes management of activities that may cause accelerated erosion. As discussed above, agricultural practices form a significant proportion of the land uses taking place on the Region's land resource and it is therefore considered appropriate to

make specific mention of this type of use. However the chapter does control the use of other land use activities so I consider it is appropriate to add reference to those activities in this section. I therefore recommend to add the words ‘and other land use’ after the word ‘agricultural in the first sentence of this section.

4.3.3 Recommendation

Accept those submissions supporting the chapter.
 Accept in part the submission requesting reference to land use practises other than agriculture.

4.3.3.1 Recommended changes to provision

Add the words ‘and other land use’ after the word ‘agricultural’ in the first sentence of this section.

4.4 Recommendation Land 4 Chapter 5 Paragraph 5.1.2 Accelerated Erosion

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
B C & J E GOWER PARTNERSHIP	106	3	That the rare February 2004 storm not be used as a reason for regulation the use of the affected areas as such regulations would not have altered the 2004 outcome.	Reject
WATER AND ENVIRONMENTAL CARE ASSN INC	311	11	5.1.2 Accelerated Erosion is supported.	Accept
MANAWATU ESTUARY TRUST	312	3	5.1.2 Accelerated Erosion is supported.	Accept
GEORGE & CHRISTINA PATON	313	3	5.1.2 Accelerated Erosion is supported.	Accept
MINISTER OF CONSERVATION	372	20	On p.5-2 add the following sentence to the end of the 4th paragraph (after 'productive land'):	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
			'On the other hand the remnants of the Manawatu dune fields are of national and regional significance in terms of biodiversity, landscape and natural character of the coast. They require a state of dynamic equilibrium in order to support transient and ephemeral wetlands and other ecosystems which are characteristic of the coastal landscape. The two extremes of accelerated erosion and the establishment of static land forms and modified soils are threats to their ecological and landscape values. They require careful and sensitive management to protect their values and avoid the effects of accelerated erosion on adjacent land.'	
	X 506	1	MANAWATU BRANCH OF N Z GREEN PARTY - Support	Accept in part
	X 533	6	FEDERATED FARMERS OF NEW ZEALAND INC - Support	Accept in part
MINISTER OF CONSERVATION	372	21	Add as a method in Section 5 or Section 7 a project to encourage active management of remnant dune fields in order to both preserve, restore or rehabilitate their natural values and avoid or reduce the effects of accelerated erosion on adjacent land.	Reject
	X 506	2	MANAWATU BRANCH OF N Z GREEN PARTY - Support	Reject
	X 533	7	FEDERATED FARMERS OF NEW ZEALAND INC - Support	Reject
ALISON MARGARET MILDON	401	60	Amend to add point (d) local and cross boundary visual effects	Reject
	X 527	377	TARARUA - AOKAUTERE GUARDIANS INC (T A G) - Support	Reject
TARANAKI FISH & GAME COUNCIL	406	5	Retain this section, but amend 5.1(a) to: (a) 50% of farms with Highly Erodible Land (see Schedule A) are sustainably managed by 2017; (b) 50% of farms with Highly Erodible Land have a whole farm business plan in place by 2017 (c) re-number (b) - (e) as (c) - (f).	Reject
	X 533	4	FEDERATED FARMERS OF NEW ZEALAND INC - Support	Reject
DIANA BAIRD	443	10	Paragraph 1 Therefore, my submission is that Horizons amend this section to read "often caused by historical ..."	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	15	No decision requested but submitter supports as an accurate description and definition of key issues.	Accept in part

4.4.1 Summarise submission points

- (a) Submitter 106/3 submits that the 2004 storm is not a reason to regulate affected areas.
- (b) Section is supported
- (c) Amend targets for sustainably farmed HEL and WFPs in place
- (d) Add 'often caused by historical..' to first paragraph
- (e) Add new paragraph referring to Manawatu dune fields.
- (f) Add method to encourage active management of remnant dune fields
- (g) Add additional point to list of on-site and off-site impacts

4.4.2 Technical Assessment

Allan Cook and Jon Roygard have prepared evidence to demonstrate the role the 2004 storms (and other events) played in enabling Horizons to develop and understanding of the relationship between land use practices, accelerated erosion, and downstream effects on communities and the environment. The evidence of John Dymond and Jon Roygard will explain how vegetation clearance and land disturbance influences how the land responds to rainfall events, indicating that the management of activities on vulnerable land will influence the impact of similar storms to those experienced in 2004. I will not repeat the matters discussed in the expert evidence, however I consider that the evidence demonstrates that the identification for the need to manage land use was not simply established as a result of a single event and that the proposed management measures will achieve an improvement in the way in which future events impact on the land.

4.4.3 Evaluation

The 2004 storm was influential in exposing the effects of land management practices on erosion. It was not, however, the sole reason for Horizons to instigate programmes to manage accelerated erosion on HEL. The 2004 events certainly highlighted the issue and the widespread impact of erosion, flooding and sediment deposition brought the issue to the attention of the regional community. It was recognised that the costs to the community and to the environment of such events was large and that methods

needed to be adopted to minimise this cost in the future. Horizons identified through comprehensive consultation with the community (as discussed in the evidence presented by Bettina Anderson at the hearing on the Overall One Plan) that the management of erosion through the control of unsustainable hill-country land use is one of the 'Big Four' issues that Horizons was asked to address.

The Land chapter seeks to manage erosion and its effects during all rainfall events, not just large ones. The proposed methods and rules incorporated into the POP have been developed to improve the land use practices on land that is susceptible to erosion in order to minimise the impacts of future natural events. I am of the opinion, based on the expert evidence presented in relation to this report, that the proposed rules and methods included in the POP will be effective in improving land use practices in many parts of the Region such that the effects of accelerated erosion will be reduced over time. I recognise however that the measures proposed in the POP will not result in an instantaneous improvement and that the improvements will result over a period of time. Amending the wording of the first sentence of the section to read 'Accelerated erosion is often caused by...' is considered appropriate. In most cases, the described land use practices will influence erosion rates, however there may be other land use practices not listed that influence erosion.

Adding in reference to visual effects as a result of accelerated erosion is not considered necessary. The list includes examples of major impacts but is not exhaustive. It is for indicative purposes only.

Including specific descriptions of the sensitivities of sand country is considered appropriate, as there is a complex balance between enabling some degree of natural erosion while minimising excessive erosion. Adding in a recognition of the national importance of the coastal environment is also considered to be appropriate, and will aid readers' understanding of the issues involved in managing the effects of human activities on the coastal environment.

However I am uncertain as to the merit of including a specific method to encourage active management of dune fields as I have not been able to determine what precise measures, other than those already available to Horizons and the submitter, would constitute such a method. At present, there is direction in the existing Land chapter methods (5.5 Methods) to aid the management of coastal sand country. This includes 'Infrastructure Protection' and 'Education in Schools – Land' which both support education about land use activities including those in sand country. The POP also includes rules in Chapter 12 – Land Use Activities and Land-Based Biodiversity that control land use activities on the coastal foredunes (specifically rules 12-2 and 12-3 for permitted and controlled activities, but also within the scope of activities requiring discretionary and non-complying resource consents under other rules in the chapter). I also note the role, outlined in Chapter 2 – Administration (2.1 Cross-boundary Issues), Horizons proposes to play in maintaining and building relationships with other local authorities to aid in the management of issues that fall within the jurisdiction of more than one authority. Managing land uses on coastal land requires an integrated approach to control land use activities that are the responsibility of both territorial authorities and Horizons. The Department of Conservation may wish to offer further suggestions

at the hearing as to how its recommendation to include an additional method related to coastal dune management could be constructed.

The submission point requesting amendments to the targets for WFBPs and sustainably managed land is more appropriately addressed in the objectives and policies of the POP rather than in this background section.

4.4.4 Recommendation

Reject submission requesting addition of visual impacts.

Accept submission requesting addition of the word 'often' to the first sentence.

Reject submission that suggests insufficient support for One Plan provisions.

Reject submissions requesting amendment to this section to incorporate WFBP targets.

Accept submissions generally supporting this provision.

Accept submission requesting additional explanation text on coastal land management.

Reject submission seeking insertion of additional method to manage coastal land uses.

4.4.4.1 Recommended changes to provision

Add the sentence 'On the other hand the remnants of the Manawatu dune fields are of national and regional significance in terms of biodiversity, landscape and natural character of the coast. They require a state of dynamic equilibrium in order to support transient and ephemeral wetlands and other ecosystems which are characteristic of the coastal landscape. The two extremes of accelerated erosion and the establishment of static land forms and modified soils are threats to their ecological and landscape values. They require careful and sensitive management to protect their values and avoid the effects of accelerated erosion on adjacent land.' to the end of the sixth paragraph (after 'productive land').

Add 'often' to the first sentence.

4.5 Recommendation Land 5 Chapter 5 Paragraph 5.1.3 Land and soil management

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
ON TRACK (N Z RAILWAYS CORPORATION)	161	1	To prevent further damage to the rail network that will be caused by future storm events, ONTRACK would like to work with both Farmers and Horizons Regional Council (HRC) to improve land management practises on Highly Erodible Land. ONTRACK will encourage providing incentives to reduce accelerated erosion.	Accept in part
RAYONIER N Z LIMITED	310	5	Recognition and endorsement of the New Zealand Environmental Code of Practice for Plantation Forestry V1 developed by the New Zealand Forest Owners Association by Horizons and include in the Proposed One Plan for forestry to remain a permitted activity.	Reject
	X 501	131	ERNSLAW ONE LTD - Support	Reject
	X 520	42	N Z FOREST MANAGERS LTD - Support	Reject
WATER AND ENVIRONMENTAL CARE ASSN INC	311	12	5.1.3 Land and Soil Management is supported.	Accept
MANAWATU ESTUARY TRUST	312	4	5.1.3 Land and Soil Management is supported.	Accept
GEORGE & CHRISTINA PATON	313	4	5.1.3 Land and Soil Management is supported.	Accept
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	5	Retain and give effect to the statements in section 5.1.3.	Accept
	X 501	188	ERNSLAW ONE LTD - Support	Accept
	X 520	59	N Z FOREST MANAGERS LTD - Support	Accept
HORTICULTURE NEW ZEALAND	357	50	Decision Sought: Retain support for recognised industry developed code of practice or similar and apply to all land uses.	Accept in part
MINISTRY OF	373	57	Add the following sentence at the end of paragraph one of section 5.1.3.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
AGRICULTURE & FORESTRY			"This process will be assisted through the formation of catchment groups each of which will be guided by an appropriately trained facilitator."	
ALISON MARGARET MILDON	401	61	Amend to add bullet point: wind farm development	Reject
	X 527	378	TARARUA - AOKAUTERE GUARDIANS INC (T A G) - Support	Reject
NEW ZEALAND INSTITUTE OF FORESTRY	419	3	Retain and give effect to the statements in section 5.1.3.	Accept
	X 501	244	ERNSLAW ONE LTD - Support	Accept
	X 520	116	N Z FOREST MANAGERS LTD - Support	Accept
FEDERATED FARMERS OF NEW ZEALAND INC	426	25	Retain 5.1.3 as written	Accept in part
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	16	We would want to see non-industry key stakeholders involved in the development of codes of practice!!!	Accept in part
	X 506	3	MANAWATU BRANCH OF N Z GREEN PARTY - Support	Accept in part

4.5.1 Summarise submission points

- (a) Include reference to facilitated catchment groups.
- (b) Involvement of non-industry stakeholders in the development of codes of practice.
- (c) Recognition and endorsement of the New Zealand Environmental Code of Practice for Plantation Forestry V1.
- (d) Add specific reference to windfarm development
- (e) General support for provision.

4.5.2 Evaluation

Submitter 373/57 requests that a statement is included in the first paragraph of this section of the POP to refer to the formulation of facilitated catchment groups. It is unclear where the submitter intends this additional sentence to be placed as the wording in the

submission does not correlate to the text in the POP. This section of the chapter provides a general overview of the approach the POP takes to land and soil management and it is not considered appropriate to add in reference to specific method at this point.

Submitters request the involvement of non-industry stakeholders in the development of codes of practice or encouragement of sustainable land management practices. I agree that the involvement of stakeholders in these processes is important and commend the proactive approach these submitter are promoting, however the precise details as to who will be consulted with and engaged in non-regulatory methods to improve land management practices is best left outside the POP to enable flexibility.

The New Zealand Environmental Code of Practice for Plantation Forestry V1 has not been included in the POP because it does not currently meet the standards required for it to be an acceptable code of practice in terms of the POP. This matter will be discussed in greater detail in later sections of this report.

Given the general nature of this section of the chapter, the request to specifically identify the effects of windfarm activities in this section is not considered necessary. The effects of windfarm activities are encompassed in the bullet points already sitting in this section.

4.5.3 Recommendation

Reject submissions requesting changes to the wording of this section.

Reject submissions requesting involvement of non-industry stakeholders in non-regulatory methods.

Reject submission requesting inclusion of the New Zealand Environmental Code of Practice for Plantation Forestry V1.

Reject submission requesting specific reference to windfarms.

Accept submissions providing general support for this provision.

4.5.3.1 Recommended changes to provision

None.

4.6 Recommendation Land 6 Chapter 5 Issue 5-1 Accelerated Erosion

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
PALMERSTON NORTH CITY COUNCIL	241	42	That Horizons adopt Issue 5-1.	Accept
	X 500	97	TARARUA DISTRICT COUNCIL - Support	Accept
	X 507	97	MANAWATU DISTRICT COUNCIL - Support	Accept
	X 515	97	HOROWHENUA DISTRICT COUNCIL - Support	Accept
	X 517	228	RANGITIKEI DISTRICT COUNCIL - Support	Accept
	X 532	97	WANGANUI DISTRICT COUNCIL - Support	Accept
GORDON GEORGE KUGGELEIJN	300	6	The way this one plan is set out the native fauna could be regarded as "pests" as their colonizing my forest could mean that NO harvesting of the crop may be possible in future. I hope this gets changed.	Accept in part
	X 501	80	ERNSLAW ONE LTD - Support	Accept in part
WATER AND ENVIRONMENTAL CARE ASSN INC	311	13	Issue 5-1 Accelerated erosion is supported.	Accept
MANAWATU ESTUARY TRUST	312	5	Issue 5-1 Accelerated erosion is supported.	Accept
GEORGE & CHRISTINA PATON	313	5	Issue 5-1 Accelerated erosion is supported.	Accept
ALISON MARGARET MILDON	401	62	Amend to add point (d) land disturbance and vegetation clearance from wind farm development	Reject
	X 527	379	TARARUA - AOKAUTERE GUARDIANS INC (T A G) – Support	Reject
POHANGINA VALLEY COMMUNITY COMMITTEE	408	2	An efficient monitoring plan to ensure policies aimed at soil conservation is needed, and needs to be added to the policies and projects in place to promote soil conservation.	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
FISH & GAME NEW ZEALAND - WELLINGTON REGION	417	11	Issue 5.1 is supported and we wish it be retained.	Accept
	X 492	65	MINISTER OF CONSERVATION - Support	Accept
FEDERATED FARMERS OF NEW ZEALAND INC	426	26	Reword Issue 5-1 (a) to replace: "farming practice" with "hill country land management", (or words to that effect) [Reword issue 5-1(c)] as follows:	Accept in part
LANDLINK LTD	440	25	(c) Land disturbance from urban development Most other land-use activities are not of a sufficient scale to have significant regional adverse effects. However, earthworks related to urban expansion and development can have significant temporary and ongoing adverse effects on waterways within local catchments. if silt and sediment control measures are inadequate or poorly managed.	Reject
DIANA BAIRD	443	11	Issue 5-1 (a) (I) Therefore, my submission is that Horizons amend this section to read "Accelerated erosion is often causing..."	Accept in part
DIANA BAIRD	443	12	Issue 5-1 (a) (ii) Therefore, my submission is that Horizons amend this section to read "Accelerated erosion is often causing..."	Accept in part
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	17	No decision requested but supports as accurate description and definition of key accelerated erosion issues.	Accept in part

4.6.1 Summarise submission points

- (a) Include an efficient monitoring plan.
- (b) Add the word 'often' to the description of the effects of accelerated erosion.
- (c) Replace 'farming practice' with an alternative wording to include other land use activities.
- (d) Include more specific description of the effects of land disturbance associated with urban development.
- (e) Specify windfarm development as a significant resource management issue.
- (f) Remove references to native vegetation being protected.
- (g) General support for the provision.

Evaluation

Monitoring of the effectiveness of the provisions of the POP is already incorporated into 5.5 Methods – Land Research, Monitoring and Reporting Programme. This existing provision, coupled with the other methods in the POP, would appear to meet the request of the submitter.

Adding the word 'often' to Issue 5-1 (a) does not seem necessary as it is recognised that accelerated erosion does actually contribute to the effects listed. This is supported by the reports that inform the POP as well as those identified in the expert evidence prepared in relation to this planning report. I do not consider that the word 'often' would assist plan readers in understanding the meaning of this paragraph.

Issue 5-1(a) is currently worded to have specific focus on farming practices in hill country and along streams. However, I agree in part with the submitter that the issue isn't exclusively a result of farming practices and there are other land use activities that contribute to the current accelerated erosion issue. The paragraph itself already refers to activities other than farming such as forestry, roading and 'other types of land disturbance', and therefore already encompasses a range of additional land uses. Therefore, I recommend that the words 'and other land use' are included after the word 'farming' in the first sentence of (a) and that the heading for (a) is amended to read 'Hillcountry Farming and Land Uses'.

Submitter 440/25 requests that more specificity is included in Issue 5-1(c) in relation to the effects of sediment from urban development. As this point in the POP is of a generic nature (it is summarising an issue), and already includes reference to effects on waterways resulting from poorly managed sediment from earthworks, I do not consider it necessary to amend the wording. I am of the opinion that the alternative wording offered by the submitter would not assist in the understanding of the provision or aiding in understanding of the issue.

Specifying windfarm development as a significant resource management issue in relation to accelerated erosion is not considered appropriate. Windfarm development certainly has the potential to cause adverse effects in relation to accelerated erosion due to the often large scale earthworks involved, however it has not been identified as a significant issue through consultation on the POP nor as a result of research. To some extent, the recommended changes to (a) to include other land uses in the Region's hill country addresses this point, as windfarm development would fall into the 'other' category. For this reason I do not consider that it is necessary to add specific reference to windfarms and that the reference to other land use activities satisfies the intent of the submission point.

Submitter 300/6 makes reference to the POP provisions effectively making native vegetation in forests 'pests'. I assume the submitter is making reference to the protection of rare and threatened habitats and at risk habitats, which is more appropriately addressed in the Living Heritage chapter.

4.6.3 Recommendation

Accept in part submission requesting that the POP includes provision for monitoring.

Reject submission requesting the addition of the word 'often'.

Accept in part submission requesting the inclusion of land use activities other than farming in (a).

Reject submission requesting more specific wording around urban development effects.

Reject submission referring to native vegetation in forests.

Accept in part submission requesting inclusion of windfarm activities.

Accept submissions providing general support for the provision.

4.6.3.1 Recommended changes to provision

Amend the heading in (a) to 'Hillcountry Farming *and Land Uses*'

Amend the wording in (a) by adding the words '*and other land use*' after the word 'farming' in the first sentence.

4.7 Recommendation Land 7 Chapter 5 Objective 5-1 Accelerated Erosion

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
J N TRIPE	52	2	No decision requested, however submitter asks: What will be the cost of the Business Plan for the 50% of farms with 'highly erodible' land required throughout the region by 2017?	Reject
J N TRIPE	52	3	No decision requested, however submitter asks: (Objective 5-1(c)) what is the definition of "minimised land disturbance"?	Accept in part
VECTOR GAS LIMITED	115	6	Vector supports retaining without further modification the following, under section 5.3 Objectives, Objective 5-1: Accelerated erosion. "Land is used in a manner that ensures: (d)the damage to roads and other infrastructure caused by landslides and sediment run-off from hill country is minimised"	Accept in part
ON TRACK (N Z RAILWAYS CORPORATION)	161	2	ONTRACK therefore seeks for Council to amend Objective 5-1(d) as follows: "the damage to roads, rail and other infrastructure..... .."	Accept in part
SUSTAINABLE WHANGANUI	176	5	Would like to see the development of sustainable management or whole business plans in place by an earlier date eg. 2012.	Reject
WILLIAM JOHN FORREST	208	1	Think again of the chances of carrying this through successfully. The rural community are already disadvantaged by the numbers game on the electoral scene. The result must be democratically acceptable.	Reject
PALMERSTON NORTH CITY COUNCIL	241	43	That Horizons adopt Objective 5-1 subject to satisfactory details on how it is to be funded.	Accept in part
	X 500	98	TARARUA DISTRICT COUNCIL - Support	Accept in part
	X 507	98	MANAWATU DISTRICT COUNCIL - Support	Accept in part
	X 515	98	HOROWHENUA DISTRICT COUNCIL - Support	Accept in part
	X 517	229	RANGITIKEI DISTRICT COUNCIL - Support	Accept in part
	X 532	98	WANGANUI DISTRICT COUNCIL - Support	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
RUAPEHU FEDERATED FARMERS OF NEW ZEALAND INC	246	7	Delete Objective 5.1 (a)	Reject
TRANSPower NEW ZEALAND LTD	265	9	A. Retain, without further modification Objective 5-1 and in particular parts (d) and (e)	Accept in part
P F OLSEN LIMITED	305	2	While detail may not be appropriate, Council should make some effort to outline a Plan B framework and also a trigger point in time and success rate by which work would commence on preparing the alternative for implementation. This is considered important as part of the bigger picture to incentivise the uptake and execution of farm plans and reinforce Councils commitment to getting hill country erosion under control.	Reject
	X 501	90	ERNSLAW ONE LTD - Support	Reject
	X 506	6	MANAWATU BRANCH OF N Z GREEN PARTY - Support	Reject
WATER AND ENVIRONMENTAL CARE ASSN INC	311	14	Objective 5-1 Accelerated erosion is supported.	Accept
MANAWATU ESTUARY TRUST	312	6	Objective 5-1 Accelerated erosion is supported.	Accept
GEORGE & CHRISTINA PATON	313	6	Objective 5-1 Accelerated erosion is supported.	Accept
NEW ZEALAND DEFENCE FORCE	330	12	Amend text and/or Schedule A to ensure clarity. (Further submissions on Schedule A are included below.)	Accept in part
NEW ZEALAND DEFENCE FORCE	330	14	1.Amend the concept and definition of "whole farm business plan" to include plans or similar documents providing for sustainable management of land other than farm land.	Accept in part
	X 522	123	MERIDIAN ENERGY LIMITED - Support	Accept in part
NEW ZEALAND DEFENCE FORCE	330	15	2.Amend the concept and definition of "whole farm business plan" to allow for Horizons to endorse and recognise for the purposes of the Proposed One Plan documents prepared by landowners without financial or other assistance from Horizons. (This would reduce the potential	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			resource demands associated with Decision Sought 1 above)	
	X 495	88	RUAPEHU DISTRICT COUNCIL - Support	Reject
TRANSIT NEW ZEALAND	336	16	That this objective be retained.	Accept
	X 492	66	MINISTER OF CONSERVATION - Support	Accept
ENVIRONMENT NETWORK MANAWATU	356	26	ENM seek the clarification as to what conditions would trigger a more regulatory approach being needed.	Reject
ENVIRONMENT NETWORK MANAWATU	356	27	That as part of the farm plan process activities that would otherwise require a consent go through a consent process so that there are enforceable conditions for the activity.	Reject
	X 531	47	HORTICULTURE NEW ZEALAND - Oppose	Accept
MIGHTY RIVER POWER	359	36	Amend Objective to replace the word 'minimised' with 'avoided, remedied or mitigated.'	Reject
	X 511	126	TRUST POWER LIMITED - Support	Reject
MINISTER OF CONSERVATION	372	22	Objective 5-1(e) Add 'landscape values, including coastal dune systems' after 'infrastructure'.	Reject
	X 533	9	FEDERATED FARMERS OF NEW ZEALAND INC – Oppose	Accept
MINISTRY OF AGRICULTURE & FORESTRY	373	60	Clarify the meaning of "sustainably managed" and explain how the sustainable management of Highly Erodible land can be demonstrated.	Accept in part
	X 495	104	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
TARANAKI / WHANGANUI CONSERVATION BOARD	374	11	The objective relating to encouraging sustainable land management practices needs to also include prevention of loss of high value soils,) maintain and optimise soil versatility and productivity.	Reject
	X 531	48	HORTICULTURE NEW ZEALAND - Oppose	Accept
	X 533	5	FEDERATED FARMERS OF NEW ZEALAND INC - Support	Reject
TARANAKI / WHANGANUI CONSERVATION BOARD	374	30	There should also be a recognition of soil as a biological entity, and aquatic biodiversity.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
TARANAKI / WHANGANUI CONSERVATION BOARD	374	9	Add "(e) the damage to property, infrastructure*, the natural character of coastal land forms, and significant habitat areas caused by accelerated wind erosion of coastal sand, and landslides and sediment run off from the natural coastal cliffs, is minimised,"	Reject
ENVIRONMENTAL WORKING PARTY	386	53	We seek the following decision from the Regional Council - that the following amendment is made to this provision in the form of an addition: (e) the damage to property, infrastructure*, significant Maori sites and significant habitat areas caused by accelerated wind erosion of coastal sand is minimised. (e) ka whakaitingia te pakaru o nga rawa, nga kaupapa o raro, nga wahi Maori me nga wahi noho whakahirahira na te tere whakahoro a-hau o nga oneone takutai moana.	Accept in part
FISH & GAME NEW ZEALAND - WELLINGTON REGION	417	12	Amend Objective 5-1(a) to read "50% of farms with Highly Erodible Land* will have a whole farm business plan in place by 2017" Add a new (b) into the Objective to read: "the operation of farms with whole farm business plans in place will be monitored and the plans updated as necessary" Add a new (c) into the Objective to read "the development, including research, of sustainable land management practices will be pursued and proven methods implemented" There is then sufficient policy support for this in Policy 5-1(b)(c) and Policy5-5	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	27	Retain objective 5.1(b) - (e) as written.	Accept in part
FEDERATED FARMERS OF NEW ZEALAND INC	426	28	Reword objective 5-1 (a) to read: "50% of Highly Erodible Land (see schedule A) have either implemented methods to effectively reduce accelerated erosion, or have a whole farm business plan in place by 2017." (or words to that effect)	Accept in part
	X 484	77	MINISTRY OF AGRICULTURE & FORESTRY - Support	

Submitter	Number	Point	Decision Sought	Recommendation
	X 522	124	MERIDIAN ENERGY LIMITED - Oppose	Reject
	X 531	46	HORTICULTURE NEW ZEALAND - Support	Accept
NGA PAE O RANGITIKEI	427	53	We seek the following decision from the Regional Council - that the following amendment is made to this provision in the form of an addition: (e) the damage to property, infrastructure*, significant Maori sites and significant habitat areas caused by accelerated wind erosion of coastal sand is minimised. (e) ka whakaitingia te pakaru o nga rawa, nga kaupapa o raro, nga wahi Maori me nga wahi noho whakahirahira na te tere whakahoro a-hau o nga oneone takutai moana.	Accept in part
MANAWATU BRANCH OF N Z GREEN PARTY	433	27	That HRC re-writes Objective 5.1 so it is clear that the operators of HEL properties that are having the worst impacts on soil loss and water quality will definitely be required to improve management, whether under a WFBP or by regulatory means.	Reject
LANDLINK LTD	440	26	Add another clause (or similar) to objective 5-1 (a) Urban expansion is located and constructed in a manner that avoids significant earthworks and protects freshwater resources.	Reject
DIANA BAIRD	443	13	Objective 5-1 (a) Therefore, my submission is that Horizons re-think and publicly consult the place/role of whole-farm-plans	Reject
DAVID AISLABIE ON BEHALF OF THE WHANGANUI BRANCH OF THE GREEN PARTY	451	5	No specific decision requested but submits that to be consistent with the RMA your objectives should focus on environmental outcomes such as hectares of erosion prone land retired, sediment reduction and flooding reduction.	Accept in part
ECOLOGIC FOUNDATION	456	5	Policy objective 5-1(a) should be amended to require 100% of farms to be either sustainable managed, or have a whole farm business plan by 2017	Reject
	X 484	84	MINISTRY OF AGRICULTURE & FORESTRY - Oppose	Accept
	X 495	87	RUAPEHU DISTRICT COUNCIL - Oppose	Accept

Submitter	Number	Point	Decision Sought	Recommendation
ECOLOGIC FOUNDATION	456	6	Proposed policy objective 5-1(b) should be upheld.	Accept in part
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	18	(c, d, e) - quantify what is meant by "minimised"	Reject
AOHANGA INCORPORATION	464	3	Te Hika a Papaauma object to this whole objective.	Reject

4.7.1 Summarise submission points

- (a) Amend the objective to provide more stringent targets for WFBP implementation (dates or percentages) (eg. 456/5, 176/5).
- (b) Submitters seek to clarify or provide clearer direction on when regulatory controls will replace WFBPs or what the consequences of non-compliance with WFBPs is (eg. 356/26, 305/2).
- (c) Submitters suggest that the costs of compliance with WFBPs will be too high or that there has not been sufficient consultation undertaken in developing the method (52/2, 443/13 and 208/1).
- (d) Submitter 330/12 request amendments to the text or to Schedule A to improve clarity in terms of defining HEL.
- (e) A number of submitters request that specific words within the objective are defined or amended to provide clarity. In particular, the terms 'minimised' and 'sustainably managed' are identified as not being defined or should be replaced with alternatives.
- (f) Submitters request that WFBPs be extended to apply to non-agricultural land uses such as defence force uses (330/15).
- (g) Submitter 417/12 requests changes to the wording of the objective to remove the reference to sustainably managed and to provide specific requirements for monitoring and updating WFBPs. The submitter also requests that the objective makes specific reference to the development of sustainable practices.
- (h) Submitters request that (e) includes reference to significant Maori sites in the coastal sand country (386/53 and 427/53). Related to this request is the request to include reference to the natural character of coastal landforms in (e).
- (i) Submitters request that an additional clause is included which directs urban expansion.
- (j) Submitter 161/2 seeks to include reference to 'rail' in the objective.
- (k) Submitter 330/14 requests that the definition of WFBPs be widened to include similar documents applicable to non-farming land.
- (l) Several submitters provide general support for the provision.

4.7.2 Technical Assessment

Objective 5-1 is the first instance in Chapter 5 – Land where there is policy direction in relation to the sustainable management of the Region’s land resources. To assist in understanding how the sustainable management of hill country became one of the ‘big four’ issues Horizons and the community identified as needing to be addressed, and how the concept of ‘sustainable management’ of the land found its way into the POP, I refer you to the expert evidence provided by Greg Carlyon, Alec McKay, Jon Roygard, Allan Kirk, Allan Cook, John Dymond and Lachie Grant. The evidence provided by these people summarises the background to the WFBP and sustainable management approach that is promoted in this objective and subsequent provisions in the Land chapter. This evidence provides a useful explanation of the motivations for a change in approach towards land management that is adopted in the POP, and outlines the steps and considerations that have evolved to the current point in time.

In particular, Dr Alec McKay provides in his evidence some background to the Whole Farm Business Plan concept, with emphasis on its relationship to sustainable management. Dr McKay’s evidence shows that sustainable management encompasses more than complying with regulations (rules) or managing new activities. It includes consideration of the ‘whole farm business’ and the relationship between the users of the natural resources and the capacity for those resources to support that use over time. Horizons have recognised that sustainable management requires a shift by resource users to active management of the land. This requires not only preventing land use activities from worsening the current state of resources, but also proactively making improvements to existing activities to resolve the environmental impacts that they may already be having. While Horizons is not able to require existing land users to modify existing activities that have previously been lawfully established, it can promote change through voluntary and non-regulatory approaches such as WFBPs.

4.7.3 Planning Assessment

The Objective specifies targets for farms on HEL to be either managed sustainably or have a WFBP in place by 2017. The objective was set up with the recognition that to bring current land use practices up to a ‘sustainable’ level is not achievable in a short period of time. The concept of ‘sustainably managed’ land is more than simply complying with the rules in the POP – it encompasses active management to reduce the impacts of passive components of these activities, not just undertaking specific activities such as earthworks or vegetation clearance in an appropriate way. To sustainably manage the land resource requires that the use of that resource occurs in a way or at a rate which leaves it available for the use of future generations. This will mean retiring areas that are unstable as pasture, or planting areas of land that are prone to slipping. Sustainable management of land also recognises the costs to the current generation in terms of the constraints on use and on the costs associated with remedying previously unsustainable activity. In this context, requiring the community and large numbers of farmers to bear the cost of this change is unlikely to be sustainable and therefore an approach where voluntary improvements to land use practices has been adopted. Where the overall balancing of the costs of change versus the benefits to the environment and future generations leans towards the former, either

financial assistance needs to be provided (on behalf of the community and the environment) or more economically sustainable approach needs to be adopted where the desired outcomes are achieved at a slower, but more affordable rate.

WFBPs, developed under the SLUI programme and therefore independently of the POP, provide a tool that achieves the same outcomes desired by the POP. WFBPs recognise and incorporate the current viability of farm businesses with the need to improve current environmental performance and manage future activities. WFBPs fit well with the 'sustainably managed' concept in that they take account of the many factors that interact to define sustainability and also recognise the need for current land users to continue to provide for their own well-being.

Objective 5-1 sets up two methodologies for approaching the management of land use:

- (a) Resource users implement non-regulatory, voluntary methods to achieve the sustainability outcomes desired by the POP; or
- (b) Resource users follow a traditional regulatory path by complying with rules in the POP which control the effects of their activities so that the effects of those activities cause no adverse effects on the existing environment.

Horizons have recognised that achieving a goal of all land use being 'sustainable' in the lifetime of the POP (10 years) is not achievable. A goal has been set to achieve a degree of sustainable management within the Region that is considered achievable, and which provides a step towards the longer-term goal of all land uses in the Region being undertaken sustainably. The rules in the POP provide a 'no worse' backstop so that new activities do not increase the adverse effects on the environment. The rules also provide a backstop for measures that have been put in place to improve the sustainable management of land, such as preventing land that has been retired or planted from being cleared of vegetation without good reason. The two-pronged approach of the objective recognises that Horizons are making a commitment to sustainable management of resources while recognising that to do so will take a period of time.

Including the term 'or sustainably managed' in the Objective (and in later policies) is intended to enable land use activities to which WFBPs do not apply (either by choice of because those activities are not incorporated into the SLUI programme) to be recognised where they are managed sustainably through a recognised framework. The 'or sustainably managed' alternative within the objective makes provision for sustainable management initiatives outside of the WFBP programme to be implemented to achieve the same goal.

The intention of the WFBP method is that guidance and assistance is provided to land users and that careful planning of land use activities occurs in a non-regulatory environment. It is the intention of the One Plan that there is an incentive to preparing and implementing WFBPs in the form of improved land use and reduced red tape associated with individual resource consent applications. If a WFBP has been prepared but the land user chooses not to abide by it with regards to land disturbance or vegetation clearance, the rules of the One Plan will come into effect. Any land users who either have not prepared WFBPS or who

have prepared them but are not abiding by them, will need to comply with the permitted activity rules of the One Plan or will need to obtain resource consents. Therefore, while the uptake and implementation of WFBPs is voluntary, the fall-back position is to comply with the rules in the One Plan. Therefore there is no need at this time to require an individual resource consent for WFBPs. Compliance with WFBPs is explicit in the relevant rules in Chapter 12.

Monitoring of WFBPs will occur as part of the Council's plan effectiveness monitoring. It is anticipated that compliance monitoring of individual farms will also occur as part of the implementation of the One Plan, as is the case with permitted activities generally.

4.7.4 Evaluation

The WFBP/sustainably managed uptake targets specified in the One Plan (50% of farms by 2017) has been recognised as an achievable target given the financial and other resources available to cover the number and geographic distribution of properties within the Region. The targets have been set recognising the funding availability to implement the programme as well as the availability of suitably qualified people to provide the necessary advice and services. This matter is discussed in some detail in the evidence of Allan Kirk and Greg Carlyon. The targets that have been proposed are recognised as being achievable given those constraints. To propose targets that are unachievable (such as 100% of farms included or earlier target dates (as is suggested in submissions on later provisions within the POP)) would undermine the integrity of the objective by indicating that it does not balance environmental outcomes with the ability for people to function effectively in an economic and social context. To achieve higher targets, additional resource would need to be funded, assuming they were available, and this funding would likely be sourced from rates or from land users themselves. It would also be inappropriate to set targets in an objective that are not likely to be achieved within the timeframe – this would also undermine the integrity of that objective.

I consider, based on the evidence presented in relation to this matter, that the target dates and percentages currently included in the objective are appropriate.

With regards to incentivising the WFBP programme or making it compulsory (by way of regulation), although the intent of the submission point is agreed with (that the WFBP approach should be adopted and adhered to by all land users), it is not considered necessary to make WFBPs compulsory or to specify 'plan B' framework should landowners choose not to adopt the WFBP approach. The One Plan clearly signals that the intention is for land users to adopt the preferred WFBP approach, with the incentives including the avoidance of piecemeal resource consenting and the favourable aspects of long-term business planning associated with the WFBP process. Where the Council's monitoring of the effectiveness of the WFBP approach signals that there are weaknesses in it or it is not being adopted to the desired levels, the Council has an opportunity to promote changes to the One Plan to modify the WFBP method or to put in place alternatives. This review process, at the very least, will occur in ten years time, which coincides with the currently proposed target dates for WFBP uptake.

Council's commitment to managing Highly Erodible Land is clearly articulated in the One Plan as well as in the SLUI programme outside the POP, and it is considered that adding additional wording to reinforce this would unnecessarily complicate the POP. I therefore do not consider it necessary to provide a 'plan B' in the POP and do not consider that making WFBPs compulsory is consistent with the way in which the approach is incorporated into the POP (i.e. utilising a method developed outside of the POP process).

Submitters raise issues of the cost of administering the WFBP method. This is addressed in the evidence of Greg Carlyon and Allan Kirk at both the farm scale and at the regional scale. To summarise, the Council has secured funding and obtained endorsement from the regional community to proceed with the SLUI (including WFBP) method independently of the POP. At the farm scale, the concept of WFBPs encompasses recognition of the costs and benefits to each individual farmer on a case by case basis. The submitters appear to raise questions on this matter rather than seeking any particular relief.

Submitters raise concerns about the level of consultation undertaken in the development of the Objective, with emphasis on the methods for managing HEL. I refer the Commissioners to the planning report and evidence presented at the hearing on the Overall One Plan, particularly the evidence of Bettina Anderson. This evidence outlines the extensive consultation that has occurred in the development of the POP and the ample opportunity members of the community have had to express any concerns. I consider that the consultation undertaken in developing this and other provisions in the POP has been significant and appropriate.

The submission requesting that the objective include a requirement to monitor and update Whole Farm Business Plans is not appropriate to include in an objective. It is more appropriate to specify how the objective will be achieved via policies, rules and methods. The request to include provision in the objective of a requirement to develop and implement sustainable land management practises is again a method for achieving the objective rather than being an objective in itself.

Submitter 330/14 (New Zealand Defence Force) requests that the land uses that WFBPs are applied to is widened from just farming activities (similar requests are made in submissions on other provisions within the POP, but in relation to other land use activities such as forestry).. The New Zealand Defence Force's submission supports the WFBP method and it wishes to be able to apply the method to land that contains highly erodible land but which is not farmed. While I commend the submitter's willingness to adopt the approach, I consider that the WFBP method is not currently set up and therefore not suitable for non-farming activities. The WFBP, as previously explained in this report and in evidence, was developed specifically to manage farming activities. The WFBP method utilises experts in farming to develop the WFBPs for each property, taking into account land use practices, financial situations and environmental constraints. At present the SLUI programme is not set up to enable the same approach to be applied to non-farming uses and some modifications would be required.

The submitter may wish to approach the SLUI team to discuss modifying the WFBP approach to apply to the Defence Force's property, in which case a change to the POP could be promoted to make provision for this method. However, at present I do not

consider a change to the provisions of the POP would result in the necessary changes to the SLUI programme and therefore the WFBP. Should the submitter wish to propose a similar sustainable management method applicable to non-farming land, Horizons would support its consideration and inclusion into the POP where appropriate.

To aid in the clarity of which land use activities WFBPs apply to, I recommend that the definition of ‘Whole Farm Business Plans’ in the Glossary is amended to make reference to WFBPs being developed in accordance with the SLUI programme. The currently definition is a little unclear and could refer to documents that are developed outside the current SLUI programme.

Inclusion of specific reference to significant Maori sites (386/53 and 427/53), coastal landscapes (372/22 and 374/9) and coastal cliffs (374/9) is considered appropriate in some cases. Minimising damage to coastal ‘landscape values’ is considered relevant in the context of the coastal environment but is more appropriately addressed in the Living Heritage chapter where matter of natural character of the coastal environment are addressed.

The coastal environment includes a significant number of significant Maori sites, primarily because Maori historically lived close to the coast to benefit from its food and other resources. Accelerated erosion has potential to cause significant Maori sites to be damaged or destroyed resulting in loss of important historical material and spiritual and cultural values. It is therefore considered appropriate that the objective recognises the importance of protecting these sites from accelerated erosion.

Management of erosion on coastal cliffs that is not directly attributable to human activity is not considered appropriate to include in this objective, which relates to the management of *accelerated* erosion.

Inclusion of specific reference to ‘rail’ in Objective 5-1 Accelerated Erosion at (d) is considered appropriate as the rail network is a key piece of existing national infrastructure. Roads and rail, being surface networks, are generally more susceptible to closures resulting from slips. The objective still refers to other infrastructure, and is therefore inclusive of infrastructure that is not specifically mentioned (such as energy generation and transmission, sanitary services, etc).

In relation to submissions requesting clarification of the term ‘minimised’, I consider that the common meaning of the word should be applied. The Compact Oxford Dictionary defines ‘minimise’ as “*reduce to the smallest possible amount or degree*”. In the common use of the word, the notion of the reduction being to the ‘smallest possible’ suggests a level of achievability. ‘Possible’ infers a degree of practicality to the outcome. In the context of reducing erosion, minimise means to reduce the amount of erosion to the smallest **possible** amount. Where it is not possible to avoid erosion altogether, the level of achievement is to reduce erosion to a level that is capable of being achieved.

Submitter 359/36 requests that the term ‘minimised’ is replaced with the phrase ‘avoided, remedied or mitigated’. I consider that this alternative provides no greater certainty. Consideration would need to be given to whether it is most appropriate to avoid, remedy or

mitigate in each situation. The natural course of consideration would be that accelerated erosion is avoided as a preference, but by including the alternative options (remedy or mitigate) suggests that avoidance is not always going to be the most appropriate approach. In which case, a level of discretion is still required in interpreting what constitutes appropriate remedial or mitigatory action. I also suggest that to avoid accelerated erosion is not necessarily achievable – almost every activity that disturbs soil or vegetation on HEL is likely to result in some degree of erosion (such as formation of rills on the surface of a new track) that would not otherwise have occurred had the land not been altered. To avoid, remedy or mitigate accelerated erosion is different to avoiding remedying or mitigating the effects of accelerated erosion.

I consider that the proposed alternative wording would not improve the clarity or the intent of the objective. I consider that the term ‘minimised’ is clear in its intended meaning, that being to reduce to the smallest possible amount or degree. Furthermore, the manner in which the objective is achieved is dictated by the policies, rules and other methods in the POP. These provisions determine what constitutes ‘minimised’ through the specific outcomes they seek to achieve.

It is not considered necessary to define ‘sustainably managed’ any more precisely than its meaning within the s5 of the Act. As discussed above and in the evidence of Dr McKay, the concept of sustainable management recognises the social, economic (including business viability), cultural and environmental factors that interact in the proper use and management of resources. WFBPs are recognised as a method for enabling sustainable management and it is for other resource users who consider equally ‘sustainable’ alternatives to the WFBP are available to promote those alternatives to Horizons for inclusion in the POP.

4.7.5 Recommendation

Accept submissions generally supporting Objective 5-1 Accelerated Erosion.

Accept in part submission 161/2 by inserting specific reference to rail infrastructure.

Reject submissions referring to uncertainty of costs.

Reject submissions requesting that the objective specifies a Plan B should the WFBP outcomes not meet expectations and that higher targets are set for achieving the objective.

Reject submissions requesting the removal of the reference to ‘sustainable land management’.

Reject submissions that request specific methods for achieving the objective are included in the objective.

Accept in part submissions requesting a definition of ‘minimised’.

Reject submissions requesting the focus of the objective to be changed.

Accept in part submissions requesting the objective is adopted unchanged.

Reject submissions requesting specific reference on the objective to soil productivity and versatility.

Accept in part submissions requesting that WFBPs are able to be developed independently of Horizons which have the same standing as WFBPs developed in conjunction with Horizons.

Accept in part submissions requesting specific reference to significant Maori sites in the objective.

Reject submissions requesting specific reference to coastal landscapes in the objective.
Reject submissions requesting that WFBPs pass through a resource consent process prior to approval.

Amend Objective 5-1 Accelerated Erosion point (d) to:

(d) The damage to infrastructure, in particular roads and rail, ~~and other infrastructure*~~ caused by landslides and sediment run-off from hill country is minimised.*

Amend the definition of ‘Whole Farm Business Plan’ in the Glossary to: **Whole Farm Business Plan** refers to a work plan or farm plan that has been prepared as part of the Sustainable Land Use Initiative (SLUI) and has been lodged with Horizons Regional Council and must contain information on

4.8 Recommendation Land 8 Chapter 5 Policy 5-1 Sustainable Management of highly erodible land – whole farm business plans

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
SUSTAINABLE WHANGANUI	176	31	We applaud the concept of whole farm plan.	Accept
SUSTAINABLE WHANGANUI	176	6	To have 50% of all farms on highly erodible land on whole farm plans by 2017 is commendable but not tight enough. We seek either a higher percentage or an earlier date for farms on highly erodible land to be covered by a whole farm plan	Reject
	X 495	91	RUAPEHU DISTRICT COUNCIL - Oppose	Accept
	X 522	125	MERIDIAN ENERGY LIMITED - Oppose	Accept
CHRIS TEO - SHERRELL	181	1	Strongly in support of SLUI but would like to see farm plans as a required condition for use of land classified as moderately or severely prone to erosion.	Accept in part
PONGAROA & THE WAY TO GO RURAL WOMEN	197	1	What additional meetings are planned where and when to inform on Chapter 5.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
PONGAROA & THE WAY TO GO RURAL WOMEN	197	2	Do you have staff who can give a précis of the one plan to interested parties eg. Women in Farming.	Reject
PONGAROA & THE WAY TO GO RURAL WOMEN	197	3	Please consider more time for consultation.	Reject
FORREST CHAMBERS	202	1	If a land management system is causing erosion and flood problems for the region, it must be changed.	Accept in part
SANDRA ROGERS	206	4	None requested but wants an answer to the question, Is there going to be compensation for farmer's loss of their land?	Reject
L A CARMICHAEL	218	1	That a total review of the implementation and costing of Whole Farm Business Plans.	Reject
	X 495	89	RUAPEHU DISTRICT COUNCIL - Support	Reject
L A CARMICHAEL	218	2	In their current form they are not legally binding. Farmers/Landowners are under no obligation and conviction to abide by any activities in the W.F.B Plan.	Accept in part
L A CARMICHAEL	218	3	At the expense of approx \$10,000 per plan this is unsustainable expenditure and irresponsible spending and wastage of Rate payers monies.	Reject
G M & S M DEADMAN PARTNERSHIP	224	2	I seek the following decision from the Regional Council: That the Regional Council withdraw Figure A:1 and review their classification of HEL after much more consultation with potentially affected landowners.	Accept in part
	X 495	90	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
G M & S M DEADMAN PARTNERSHIP	224	3	I seek the following decision from the Regional Council: That the Regional Council implement Whole Farm business Plans only for properties that are contain land deemed severely and very extremely erodible and that rules 12.2, 12.3, 12.4 be implemented on an individual property basis after much more scientific investigation.	Reject
PALMERSTON NORTH CITY COUNCIL	241	44	That Horizons reconsider Policy 5-1 and 5-2 and provide an analysis of costs and benefits of SLUI, in particular the costs that will fall upon	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			regional ratepayers in the future.	
	X 500	99	TARARUA DISTRICT COUNCIL - Support	Reject
	X 507	99	MANAWATU DISTRICT COUNCIL - Support	Reject
	X 515	99	HOROWHENUA DISTRICT COUNCIL - Support	Reject
	X 517	230	RANGITIKEI DISTRICT COUNCIL - Support	Reject
	X 532	99	WANGANUI DISTRICT COUNCIL - Support	Reject
RAYONIER N Z LIMITED	310	7	Adopt recommendations as stated in the plan that support non regulatory methods for achieving sustainable management.	Accept
	X 501	133	ERNSLAW ONE LTD - Support	Accept
	X 520	44	N Z FOREST MANAGERS LTD - Support	Accept
WATER AND ENVIRONMENTAL CARE ASSN INC	311	15	Policy 5-1 Sustainable management of Highly Erodible Land - whole farm business plans is supported.	Accept
MANAWATU ESTUARY TRUST	312	7	Policy 5-1 Sustainable management of Highly Erodible Land - whole farm business plans is supported.	Accept
GEORGE & CHRISTINA PATON	313	7	Policy 5-1 Sustainable management of Highly Erodible Land - whole farm business plans is supported.	Accept
ROGER WILLIAM LUSCOMBE	320	1	I am shocked at proposals such as the retirement of land over 20% gradient, being only allowed to cut one hectare of regenerating scrub & native plants, etc.	Reject
NEW ZEALAND DEFENCE FORCE	330	13	Amend text and/or Schedule A to ensure clarity. (Further submissions on Schedule A are included below.)	Accept in part
NEW ZEALAND DEFENCE FORCE	330	16	1. Amend the concept and definition of "whole farm business plan" to include plans or similar documents providing for sustainable management of land other than farm land.	Reject
	X 522	126	MERIDIAN ENERGY LIMITED - Support	
NEW ZEALAND DEFENCE FORCE	330	17	2. Amend the concept and definition of "whole farm business plan" to allow for Horizons to endorse and recognise for the purposes of the	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			Proposed One Plan documents prepared by landowners without financial or other assistance from Horizons. (This would reduce the potential resource demands associated with Decision Sought 1 above)	
	X 522	127	MERIDIAN ENERGY LIMITED - Support	Reject
MANAWATU DISTRICT COUNCIL	340	32	Include the material from Policy 5-1 in Part II of the One Plan, probably in Chapter 12.	Reject
	X 481	588	PALMERSTON NORTH CITY COUNCIL - Support	Reject
MIGHTY RIVER POWER	359	35	Recognise the role that environmental management plans play in avoiding, remedying or mitigating adverse effects from erosion; and	Accept in part
	X 511	127	TRUST POWER LIMITED - Support	Accept in part
MINISTRY OF AGRICULTURE & FORESTRY	373	45	Retain Policy 5-1.	Accept
	X 492	68	MINISTER OF CONSERVATION - Support	Accept
	X 495	105	RUAPEHU DISTRICT COUNCIL - Oppose	Reject
MINISTRY OF AGRICULTURE & FORESTRY	373	58	Retain Policy 5-1 (b).	Accept
	X 495	106	RUAPEHU DISTRICT COUNCIL - Oppose	Reject
MINISTRY OF AGRICULTURE & FORESTRY	373	59	Change Policy 5-1 (a) text be consistent with Objective 5-1 by adding "50% of farms with Highly Erodible Land are either being sustainably managed or have a whole farm business plan..."	Reject
	X 495	107	RUAPEHU DISTRICT COUNCIL - Oppose	Accept
MINISTRY OF AGRICULTURE & FORESTRY	373	61	Retain Whole Farm Business Plan approach.	Accept
MINISTRY OF AGRICULTURE & FORESTRY	373	62	Reduce the size of the Whole Farm Business Plan template.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
RURAL WOMEN NEW ZEALAND	380	2	RWNZ supports Policy 5.1 where it states that agriculture is the foundation of the Regions economy and is one of the key elements that have defined the social and visual landscape. However, RWNZ cautions Council against taking an unnecessarily restrictive precautionary approach toward entire land categories.	Accept in part
DAVID LEONARD HOPKINS	382	1	Clarification is required, please describe what is meant by other methods.	Reject
ALFRED JAMES SIVYER	387	5	No specific decision requested, however submitter notes their opposition to this provision.	Reject
PROPERTY RIGHTS IN NEW ZEALAND INC	393	4	That the whole chapter [Land] be removed or amended to recognise that sediment originates from many sources, not just from landslides. Given that the Regional Council has not carried out a Section 32 monitoring programme of its previous rules, we seek that Council returns to the Status quo and fulfill its obligations. When Council can identify all the sources of sediment loading it will be in a position to regulate if that can be shown to be justifiable.	Reject
	X 475	1	B W TYLEE ON BEHALF OF PROPERTY RIGHTS IN NEW ZEALAND - Support	Reject
	X 514	1	VELMA JUNE SIEMONEK - Support	Reject
MICHAEL GEORGE PETERSEN	399	1	Removal of the personal impositions of qualifying for the Farm Business Plan in favour of a friendly and affordable scheme based on education and healthy sustainability of the community.	Reject
TARANAKI FISH & GAME COUNCIL	406	6	Retain this section	Accept
FISH & GAME NEW ZEALAND - WELLINGTON REGION	417	13	Policy 5-1 is supported and we wish it be retained.	Accept in part
	X 492	67	MINISTER OF CONSERVATION - Support	Accept in part
FEDERATED FARMERS OF NEW ZEALAND INC	426	29	Reword Policy 5-1 (a) "Regional Council aims to have 50% of farms with Highly Erodible Land	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			covered by whole farm plans or have implemented methods to effectively reduce accelerated erosion by 2017." (or words to that effect)	
	X 522	128	MERIDIAN ENERGY LIMITED - Oppose	Accept in part
FEDERATED FARMERS OF NEW ZEALAND INC	426	30	Reword Policy 5-1 (c) as follows: "(c) A non-regulatory approach has been adopted to encourage the use and uptake of whole farm business plans to achieve sustainable land use on highly Erodible Land." (or words to that effect)	Accept in part
GEORGE R ROSS	441	1	I support the principles of SLUI and the management of Highly Erodible Land, however 5.4.1 (c) the initiative must remain non regulatory as it would be outside Horizons role and area of expertise to become involved in implementing Whole Farm Plans.	Accept in part
MIDDLE DISTRICTS FARM FORESTRY ASSOCIATION	444	4	No specific decision requested, however submitter does suggest that more education and guidance is needed to help complete the WFBP requirement within time frame suggested. More thought needs to be given to means of encouraging action on recommendations as it would seem that little tree planting is planned for the immediate future. In agreement with other forestry submissions, we also believe there is a case for Whole Forest Business Plans.	Accept in part
	X 501	277	ERNSLAW ONE LTD - Support	Accept in part
DAVID AISLABIE ON BEHALF OF THE WHANGANUI BRANCH OF THE GREEN PARTY	451	1	No specific decision requested but submits that the regional plan must therefore focus on eliminating the EXISTING pastoral land use on the 300 000 hectares of class VIII and VIIE land identified in this plan.	Reject
DAVID AISLABIE ON BEHALF OF THE WHANGANUI BRANCH OF THE GREEN PARTY	451	2	No specific decision requested but submits that we need policy that faces up to the historic reality of 60 years of farmer denial and intransigence; rather than pretend that yet more education and awareness raising will suddenly be successful. There is no logical reason why farmers should be exempt from the polluter pays principle and obligations that other	Reject

Submitter	Number	Point	Decision Sought	Recommendation
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	19	industries have to work within. (c) amend as follows "other methods, including rules will be evaluated and implemented as necessary to achieve the desired outcomes within specified timeframes"	Reject

4.8.1 Summarise submission points

- (a) Submitters request that the targets and outcomes for HEL are tightened or that WFBPs are made compulsory (eg. 451/2 and 176/6).
- (b) Definition of HEL needs to be revised and Schedule A map amended.
- (c) Extend WFBPs to include land uses other than farming, including forestry (330/16, 444/4).
- (d) Add reference to farms being sustainably managed or to have implemented methods to reduce accelerated erosion to the policy (373/59 and 426/29).
- (e) Submitters encourage the use of methods such as education in place of WFBPs (399/1). Lack of consultation or request for more consultation around WFBPs (197/2).
- (f) Submitters request that the whole chapter is removed or that further evaluation is undertaken in relation to the costs and benefits of WFBPs (218/3, 393/4 and 241/44).
- (g) Submitters provide general support for the SLUI and WFBP programme.

4.8.2 Technical Assessment

The current definition of HEL in the POP refers to the map in Schedule A. This map is a useful tool at a regional scale as it aids in identification of areas where HEL is present. However it is not suitable for identifying HEL at a farm or paddock scale and therefore is of limited use to plan readers. The evidence of John Dymond, Alec McKay and Jon Roygard touches on where the definition of HEL originated and how it is applied at a farm scale. The conclusion of the evidence is that identifying HEL at the local scale requires consideration of a number of factors, including slope, rock type and characteristics of erosion that has already occurred.

Horizons staff have met with groups of submitters at several pre-hearing meetings partly to discuss the definition of HEL and how it is best applied on individual farms. A draft definition was provided to submitters and there appeared to be agreement in principle that the proposed definition was more appropriate than the existing map approach. This definition is derived from the definition of HEL that was developed by John Dymond. Further prehearing meetings are planned to resolve some outstanding concerns

surrounding how the definition would be applied, however these are scheduled for after the date this report must be sent to submitters. I propose to discuss any progress made at these pre-hearing meetings at the hearing.

Horizons is supporting project to review the current Land Use Capability Handbook used to map the land resource. The review intends to provide a level of analysis that is more readily adaptable at the farm scale rather than the existing 1:50,000 scale analysis. This programme is discussed in more detail in the evidence of Jon Roygard.

4.8.3 Evaluation

The issue of whether WFBPs should be made compulsory or enforced through regulation has been addressed in the section of this report which addressed Objective 5-1. I will not repeat those comments but summarise that the WFBP method has been developed as a non-regulatory tool outside the POP but is recognised as being able to achieve the outcomes sought by the POP. Resource availability and the voluntary nature of the WFBP approach makes it inappropriate to make their implementation compulsory.

The retention of the current Schedule A (map identifying areas of HEL) would seem to be of limited benefit to POP users. While it provides a general overview of the areas of HEL in the Region, it does not assist in property-scale resource management practices. I therefore recommend that the map in Schedule A be replaced with a more appropriate definition.

The current definition of HEL in the Glossary of the POP refers directly to Schedule A. I recommend that this definition is amended to reflect the definition promoted by Horizons at the pre-hearing meetings on the Land chapter. This definition provides a greater level of certainty for plan users. As the final adjustments to the definition via pre-hearing meetings have not been resolved at the time of writing this report, I propose that further discussion of this matter occurs at the hearing, either to confirm the preferred definition or to explore areas of contention.

Extending the WFBP approach to other land uses is considered to be a favourable approach, however at present the template and framework to apply the approach to those other land uses has not been developed as part of the WFBP programme. To amend the definition of WFBP in the POP to incorporate land uses not currently catered for in the SLUI programme would not be appropriate. There would be no legal method to alter the WFBP approach under SLUI simply by altering the definition of WFBP in the POP. I consider that the change to the definitions in the POP must occur in the opposite direction, that being to develop the sustainable management programme appropriate to other land uses and then incorporate that into the POP. This would apply to forestry activities and other activities (such as those of the NZ Defence Force).

Submitter 426/30 requests that the reference in (c) to considering other methods should the outcomes of existing policy direction are not achieved be deleted. I agree with this recommendation. It is a somewhat redundant statement as alternative methods and a

change in policy direction to place more emphasis on them could only come about via a change to the POP. This would need to follow a public process rather than being a change of direction within the existing document.

Submitter 426/29 seeks to add the words ‘or have implemented methods to effectively reduce accelerated erosion’ to (a). I consider that this policy is directed at implementing WFBPs specifically and therefore need not include reference to other management outcomes. Objective 5-1 seeks to have 50% of farms either being sustainably managed or have WFBPs in place. Simply reducing accelerated erosion will not necessarily correspond to ‘sustainable management’ of the land resource. Reducing accelerated erosion may mean that land use practices are still largely unsustainable despite a change in accelerated erosion rates. I therefore consider that including the requested wording in the policy would not aid in achieving the objective.

As previously discussed in this report and at the hearing on the Overall One Plan, Horizons have undertaken a comprehensive consultation programme, which has included the approach for managing HEL. I consider, based on the previous evidence presented, that the level of consultation has been appropriate. Submitters seeking more information on the WFBP approach are directed to Horizons staff who I am sure will provide information on the approach.

Submitters raise concerns about the level of cost and benefit analysis that has contributed to the development of the Land chapter. The evidence of Greg Carlyon, Alec McKay and Jon Roygard describes the considerations of costs and benefits of the WFBP approach, both to the Regional community and to individuals. I am of the opinion, based on the expert evidence provided, that a comprehensive evaluation of the costs and benefits of the WFBP approach has been undertaken.

4.8.4 Recommendation

Reject submissions that request that the targets and outcomes for HEL are tightened or that WFBPs are made compulsory (eg. 451/2 and 176/6).

Accept submissions identifying that the definition of HEL needs to be revised and Schedule A map amended.

Reject submissions requesting to extend WFBPs to include land uses other than farming, including forestry (330/16, 444/4).

Reject submissions requesting to add reference to farms being sustainably managed or to have implemented methods to reduce accelerated erosion to the policy (373/59 and 426/29).

Accept in part submissions that encourage the use of methods such as education in place of WFBPs (399/1). Lack of consultation or request for more consultation around WFBPs (197/2).

Reject submissions that request that the whole chapter is removed or that further evaluation is undertaken in relation to the costs and benefits of WFBPs (218/3, 393/4 and 241/44).

Accept submissions that provide general support for the SLUI and WFBP programme.

4.8.4.1 Recommended changes to provision

None. Please refer to the section of the report addressing Schedule A for details on recommended changes to the definition of HEL.

4.9 Recommendation Land 9 Chapter 5 Policy 5-2 Sustainable management of other land – whole farm business plans

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
PALMERSTON NORTH CITY COUNCIL	241	45	That Horizons reconsider Policy 5-1 and 5-2, and provide an analysis of costs and benefits of SLUI, in particular the costs that will fall upon regional ratepayers in the future.	Reject
	X 500	100	TARARUA DISTRICT COUNCIL - Support	Reject
	X 507	100	MANAWATU DISTRICT COUNCIL - Support	Reject
	X 515	100	HOROWHENUA DISTRICT COUNCIL - Support	Reject
	X 517	231	RANGITIKEI DISTRICT COUNCIL - Support	Reject
	X 532	100	WANGANUI DISTRICT COUNCIL - Support	Reject
NEW ZEALAND DEFENCE FORCE	330	18	1.Amend the concept and definition of "whole farm business plan" to include plans or similar documents providing for sustainable management of land other than farm land.	Reject
	X 522	129	MERIDIAN ENERGY LIMITED - Support	Reject
NEW ZEALAND DEFENCE FORCE	330	19	2.Amend the concept and definition of "whole farm business plan" to allow for Horizons to endorse and recognise for the purposes of the Proposed One Plan documents prepared by landowners without financial or other assistance from Horizons. (This would reduce the potential resource demands associated with Decision Sought 1 above)	Reject
	X 522	130	MERIDIAN ENERGY LIMITED - Support	Reject

Submitter	Number	Point	Decision Sought	Recommendation
MANAWATU DISTRICT COUNCIL	340	33	Include the material from Policy 5-2 in Part II of the One Plan, probably in Chapter 12.	Reject
	X 481	589	PALMERSTON NORTH CITY COUNCIL - Support	Reject
MINISTRY OF AGRICULTURE & FORESTRY	373	46	Retain Policy 5-2.	Accept
	X 492	69	MINISTER OF CONSERVATION - Support	Accept
ALFRED JAMES SIVYER	387	6	No specific decision requested, However submitter notes their opposition to this provision.	Reject
MICHAEL GEORGE PETERSEN	399	2	Removal of the personal impositions of qualifying for the Farm Business Plan in favour of a friendly and affordable scheme based on education and healthy sustainability of the community.	Reject
TARANAKI FISH & GAME COUNCIL	406	7	Retain this section	Accept
FEDERATED FARMERS OF NEW ZEALAND INC	426	31	Retain as Policy 5-2 written.	Accept

4.9.1 Summarise submission points

- (a) Submitter requests that WFBP approach is replaced with education methods.
- (b) Extend WFBPs to include land uses other than farming, including forestry (330/18/19).
- (c) Submitters request that the whole chapter is removed or that further evaluation is undertaken in relation to the costs and benefits of WFBPs (241/45).
- (d) Submitters request that cross references to other chapters are included (340/33).
- (e) Submitters support the provision.

4.9.2 Evaluation

Replacement of the WFBP approach with education methods has been addressed in previous sections of this report. The WFBP approach is voluntary and does not negate the use of other methods proposed in the POP relating to education and promotion of sustainable management measures.

Extending the WFBP approach to other non-farming land uses has been discussed in previous sections of this report. The current WFBP framework has been developed specifically for farming activities and therefore cannot be immediately applied to other land uses. Land users wishing to adopt a similar approach are able to develop the method by which sustainable management will be established and seek for that to be included in the POP at a later date (via plan change).

Evaluation of the costs and benefits of the WFBP approach has already been discussed in previous sections of this report. I am of the opinion, based on the evidence presented, that an appropriate level of evaluation of the costs and benefits of the proposal has been undertaken.

The submitter requests that material from Policy 5-2 is included in the RP section of the POP. The submitter refers to the relationship between the RPS and the RP sections of the POP. This relationship is discussed in more detail in the Planning report by Helen Marr on the Overall One Plan. The POP already contains reference to the relationship between the two sections and it is not considered necessary to include material from this policy in Chapter 12 of the POP.

4.9.3 Recommendation

Reject submissions requesting that WFBP approach is replaced with education methods.

Reject submissions requesting extending WFBPs to include land uses other than farming, including forestry (330/18/19).

Reject submissions that request that the whole chapter is removed or that further evaluation is undertaken in relation to the costs and benefits of WFBPs (241/45).

Reject submissions that request that cross references to other chapters are included (340/33).

Accept submissions that support the provision.

4.9.3.1 Recommended changes to provision

None.

4.10 Recommendation Land 10 Chapter 5 Policy 5-3 Regulation of vegetation clearance and land disturbance on highly erodible land

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
AIRWAYS CORPORATION OF NEW ZEALAND	36	1	Airways seek the retention of Policy 5-3 as per the Proposed One Plan	Accept
	X 476	1	PALMERSTON NORTH AIRPORT LTD - Support	Accept
AIRWAYS CORPORATION OF NEW ZEALAND	36	2	Airways also request that this policy be carried through to Rules in the Plan, by including a rule that allows maintenance activities, such as vegetation clearance, around its infrastructure (such as navigational aids) a permitted activity. Possible wording of this rule could be: "The maintenance of existing infrastructure, including the trimming and removal of plants where these pose a risk to the continuation of operations, is a permitted activity provided a) vegetation is not left in a position where it may enter a waterbody; b) there shall be no discharge of contaminants, other than sediment, into any waterbody."	Accept in part
	X 476	2	PALMERSTON NORTH AIRPORT LTD - Support	Accept in part
MARION GILLARD	46	6	Remove Policy 5.3 until the definition of Highly Erodible land is more clearly defined.	Accept in part
	X 495	92	RUAPEHU DISTRICT COUNCIL - Support	Accept
ANTHONY DAVID & GAYLENE MAY ATKINS	56	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
	X 485	3	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Reject
ANTHONY DAVID & GAYLENE MAY ATKINS	56	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
RICHARD JOHN & CORAL EVELYN EDWARDS	57	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
	X 485	4	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Reject
RICHARD JOHN & CORAL EVELYN EDWARDS	57	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
CLIFTON HOWARD TOMBLESON	58	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
	X 485	5	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Reject
CLIFTON HOWARD TOMBLESON	58	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
PUKEKAHU FARM LTD	60	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
	X 485	6	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Reject
PUKEKAHU FARM LTD	60	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
DAVID EARLE ROBINS MATTHEWS	65	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
	X 485	7	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Reject
DAVID EARLE ROBINS MATTHEWS	65	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor	Reject

Submitter	Number	Point	Decision Sought	Recommendation
RUSSELL SULLIVAN	94	2	adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
	X 485	8	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Reject
RUSSELL SULLIVAN	94	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
BRUCE EDWARD CULLEY	98	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
	X 485	9	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Reject
BRUCE EDWARD CULLEY	98	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
B C & J E GOWER PARTNERSHIP	106	4	Scrub regrowth clearance should not be included in the restrictions that the ONE PLAN has put in place as noted in 5.3a	Reject
ALLAN FRANCIS O'NEIL & F J O'NEIL & SONS	113	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
ALLAN FRANCIS O'NEIL & F J O'NEIL & SONS	113	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
VECTOR GAS LIMITED	115	7	Vector supports retaining without further modification the following, under section 5.4.1 Accelerated Erosion, Policy 5-3: Regulation of vegetation clearance and land disturbance on Highly Erodible Land.	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
			"(a)Vegetation clearance and land disturbance, including excavation, filling, tracking and soil cultivation, shall generally not be allowed on Highly Erodible Land unless: (iii)the activity is for the purpose of establishing or maintaining a fenceline or other infrastructure and there is no reasonable alternative location,"	
PETER ALEXANDER ANDERSON	121	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
PETER ALEXANDER ANDERSON	121	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
HEATHER OLIVER	144	3	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
	X 485	10	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Reject
HEATHER OLIVER	144	4	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
	X 495	93	RUAPEHU DISTRICT COUNCIL - Support	Reject
WINSTON OLIVER	145	4	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
	X 485	13	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Reject
WINSTON OLIVER	145	5	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
RUAPEHU DISTRICT	151	51	(d) Remove Policy 5.3 until a more appropriate definition of Highly	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
COUNCIL			Erodible Land is available to access the effect on the four well beings of the Ruapehu communities under the LGA.	
	X 481	116	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
JOHN COLLIER DONALD	154	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
JOHN COLLIER DONALD	154	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
BARRY & GLENDA WADE	155	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
BARRY & GLENDA WADE	155	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
COLIN CASELEY	156	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
COLIN CASELEY	156	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
WARRICK & SALLY STREET	157	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
WARRICK & SALLY STREET	157	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject

Submitter	Number	Point	Decision Sought	Recommendation
DEAN ROBERT SHERSON	158	1	I oppose this policy as the Council has failed to show that normal farm practices are reducing the productive capacity or degrading the life supporting capacity of this land	Reject
BRIAN DOUGLAS SHERSON	159	2	I oppose this policy as the Council has failed to show that normal farm practices are reducing the productive capacity or degrading the life supporting capacity of this land	Reject
ON TRACK (N Z RAILWAYS CORPORATION)	161	3	ONTRACK supports Policies 5.3 and would like to be involved in developing best management processes.	Accept
KERRY JOHN THOMPSON	175	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
DONALD ALAN WINDLE	186	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
DONALD ALAN WINDLE	186	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
IAN DOUGLAS MC COUBRIE	187	1	Drafting of a new rule demanding that clearing of regenerating vegetation (eg Manuka and carpet fern) be as of right in the proposed HEL land area in the One Plan. It is my considered opinion that if draconian regulations are enacted against me my farm would revert to scrub within 10 years. This would be an economic disaster for my family.	Reject
IAN DOUGLAS MC COUBRIE	187	2	I demand that our harvesting of exotic plantation be as of right.	Reject
	X 501	15	ERNSLAW ONE LTD - Support	Reject
IAN DOUGLAS MC COUBRIE	187	3	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
	X 485	11	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Reject

Submitter	Number	Point	Decision Sought	Recommendation
IAN DOUGLAS MC COUBRIE	187	4	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
RODNEY STEWART MC COUBRIE	188	1	Drafting of a new rule demanding that clearing of regenerating vegetation (eg Manuka and carpet fern) be as of right in the proposed HEL land area in the One Plan. It is my considered opinion that if draconian regulations are enacted against me my farm would revert to scrub within 10 years. This would be an economic disaster for my family.	Reject
RODNEY STEWART MC COUBRIE	188	2	I demand that our harvesting of exotic plantation be as of right.	Reject
	X 501	16	ERNSLAW ONE LTD - Support	Reject
RODNEY STEWART MC COUBRIE	188	4	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
	X 485	14	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Reject
RODNEY STEWART MC COUBRIE	188	5	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
PATRICK WILLIAM CARROLL	189	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
PATRICK WILLIAM CARROLL	189	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
STUART MC NIE	198	3	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 485	12	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Reject
STUART MC NIE	198	4	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
ROSEANNE PARKES	217	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
ROSEANNE PARKES	217	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
DAVID JOHN WELLS	223	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
DAVID JOHN WELLS	223	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
RUAPEHU FEDERATED FARMERS OF NEW ZEALAND INC	246	8	Normal farm practices must remain permitted activities, without conditions	Reject
	X 514	5	VELMA JUNE SIEMONEK - Support	Reject
RUAPEHU FEDERATED FARMERS OF NEW ZEALAND INC	246	9	Delete Policy 5.3	Reject
RICHARD PORRITT	247	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
RICHARD PORRITT	247	3	Normal farm activities including vegetation clearance and land disturbance	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	
MATTHEW BLACK	248	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
MATTHEW BLACK	248	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
ANDREW PORRITT	249	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
ANDREW PORRITT	249	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
TRANSPower NEW ZEALAND LTD	265	10	A. Retain, without further modification Policy 5-3 and in particular part (a)(iii).	Accept
	X 485	2	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Accept
GENESIS POWER LTD	268	21	Retain Policy 5-3	Accept
	X 511	128	TRUST POWER LIMITED - Oppose	Reject
GEOFFREY THOMAS BURTON	271	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
GEOFFREY THOMAS BURTON	271	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
FRASER LINDSAY	289	2	Vegetation clearance and land disturbance shall generally be allowed on	Reject

Submitter	Number	Point	Decision Sought	Recommendation
HORROCKS			HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	
FRASER LINDSAY HORROCKS	289	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
JOHN COLIN BLACK	292	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
JOHN COLIN BLACK	292	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
BLAIR PATRICK SHORTALL	302	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
BLAIR PATRICK SHORTALL	302	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
JAMES TRUEBRIDGE & SUE YEREX	304	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
JAMES TRUEBRIDGE & SUE YEREX	304	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
ATIHAU - WHANGANUI INCORPORATION	309	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
ATIHAU - WHANGANUI	309	3	Normal farm activities including vegetation clearance and land disturbance	Reject

Submitter	Number	Point	Decision Sought	Recommendation
INCORPORATION			shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	
RAYONIER N Z LIMITED	310	10	Clarify the status of forests planted under 5-3(a)v as to whether harvest of these forests will be allowed as under 5-3(a) iv and in particular wishes such activities to be permitted.	Accept in part
	X 501	113	ERNSLAW ONE LTD - Support	Accept in part
RAYONIER N Z LIMITED	310	9	Rayonier support non regulatory methods for allowing activities to continue that provide long term benefits for sustainable management of the region and limit erosion and no decision is sought.	Accept
	X 501	135	ERNSLAW ONE LTD - Support	Accept
WATER AND ENVIRONMENTAL CARE ASSN INC	311	16	DELETE "significantly."	Reject
	X 511	134	TRUST POWER LIMITED - Support	Reject
MANAWATU ESTUARY TRUST	312	8	DELETE "significantly."	Reject
	X 531	50	HORTICULTURE NEW ZEALAND - Oppose	Accept
GEORGE & CHRISTINA PATON	313	8	DELETE "significantly."	Reject
DONALD JAMES POLSON	329	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
	X 524	2	DEAN GREGORY SPARKES - Support	Reject
DONALD JAMES POLSON	329	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
	X 524	3	DEAN GREGORY SPARKES - Support	Reject

Submitter	Number	Point	Decision Sought	Recommendation
NEW ZEALAND DEFENCE FORCE	330	20	1.Amend the concept and definition of "whole farm business plan" to include plans or similar documents providing for sustainable management of land other than farm land.	Reject
NEW ZEALAND DEFENCE FORCE	330	21	2.Amend the concept and definition of "whole farm business plan" to allow for Horizons to endorse and recognise for the purposes of the Proposed One Plan documents prepared by landowners without financial or other assistance from Horizons. (This would reduce the potential resource demands associated with Decision Sought 1 above)	Reject
NEW ZEALAND DEFENCE FORCE	330	28	Amend Policy 5-3 (a)(iii) by replacement of the word fencelines with the words essential facilities or activities	Reject
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	10	reword policy 5.3 (a) (v) to also allow for subsequent harvesting and reestablishment activities	Accept in part
	X 501	150	ERNSLAW ONE LTD - Support	Accept in part
	X 520	64	N Z FOREST MANAGERS LTD - Support	Accept in part
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	6	Amend policy 5-3 to ensure that the policy of generally not allowing" vegetation clearance and land disturbance on Highly Erodible land only applies to that land which is in fact highly erodible, as opposed to the blanket area shown on the map in Appendix A.	Accept in part
	X 501	189	ERNSLAW ONE LTD - Support	Accept in part
	X 520	60	N Z FOREST MANAGERS LTD - Support	Accept in part
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	7	Alternatively [to 331/6] amend the definition of Highly Erodible Land	Accept in part
	X 501	190	ERNSLAW ONE LTD - Support	Accept in part
	X 520	61	N Z FOREST MANAGERS LTD - Support	Accept in part
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	8	Alternatively [to 331/6] amend the map in Appendix A	Accept in part
	X 501	191	ERNSLAW ONE LTD - Support	Accept in part
	X 520	62	N Z FOREST MANAGERS LTD - Support	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	9	Retain clauses (a) (iv) and (v) of policy 5.3	Accept in part
	X 501	192	ERNSLAW ONE LTD - Support	Accept in part
	X 520	63	N Z FOREST MANAGERS LTD - Support	Accept in part
GEORGE ANTHONY MATTHEWS	333	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
GEORGE ANTHONY MATTHEWS	333	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
GRAHME WATKINS	335	1	No specific decision requested but is opposed to the clearing of Manuka.	Reject
TRANSIT NEW ZEALAND	336	17	Policy 5-3 (a)(iii) That this policy be retained.	Accept
STEWART LESLIE MATTHEWS	342	2	Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.	Reject
STEWART LESLIE MATTHEWS	342	3	Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way	Reject
ENVIRONMENT NETWORK MANAWATU	356	23	A definition of what is an operative farm plan constitutes, ENM suggest that operative farm plan is one that is following the recommendations/works schedule.	Reject
TRUST POWER LIMITED	358	23	Either insert an additional Policy 5-3 provision (a)(iii) as follows: "(iii) the activity is for the purpose of establishing or maintaining infrastructure and development of energy generation facilities. Or, insert a cross-reference in Policy 5-3 (a) to the policies and objectives of Chapter 3 in relation to providing for infrastructure and energy	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
			generation. Any similar amendments to like effect. Any consequential amendments that stem from the amendment of Policy 5-3 as proposed in this submission.	
	X 522	131	MERIDIAN ENERGY LIMITED - Support in Part	Accept in part
TRUST POWER LIMITED	358	24	Amend Policy 5-3(b) to include: or land instability, except for temporary construction activities in relation to creating and maintaining infrastructure and renewable energy developments. Any similar amendments to like effect. Any consequential amendments that stem from the amendment of Policy 5-3 as proposed in this submission.	Accept in part
	X 522	132	MERIDIAN ENERGY LIMITED - Support in Part	Accept in part
MIGHTY RIVER POWER	359	37	Recognise the role that environmental management plans play in avoiding, remedying or mitigating adverse effects from erosion; and Delete the words in (iii) to read as follows: (iii) The activity is for the purpose of establishing or maintaining a fence line	Reject
	X 511	129	TRUST POWER LIMITED - Support	Reject
MIGHTY RIVER POWER	359	38	Insert a new point (v) as follows and renumber existing (v) as (vi) : (v)The activity is for the purpose of establishing and maintaining infrastructure and a comprehensive environmental management plan has been submitted to the Council.	Accept in part
	X 511	130	TRUST POWER LIMITED - Support	Accept in part
	X 522	133	MERIDIAN ENERGY LIMITED - Support in Part	Accept in part
MERIDIAN ENERGY LIMITED	363	55	Meridian opposes in part Policy 5-3 and seeks the following amendments or similar: Add a new clause to address renewable energy generation facilities as	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			<p>follows: The activity is for the purpose of establishing or maintaining a renewable energy generation facility in accordance with a renewable energy development plan. Any consequential amendments necessary to give effect to this submission</p>	
	X 511	131	TRUST POWER LIMITED - Support	Reject
MERIDIAN ENERGY LIMITED	363	56	<p>Meridian opposes in part Policy 5-3 and seeks the following amendments or similar:</p> <p>Amend clause (a)(iii) to delete the words: and there is no reasonable alternative location". Any consequential amendments necessary to give effect to this submission</p>	Reject
	X 511	132	TRUST POWER LIMITED - Support	Reject
MERIDIAN ENERGY LIMITED	363	57	<p>Meridian opposes in part Policy 5-3 and seeks the following amendments or similar:</p> <p>Amend clause (b) as follows: (b)Any vegetation clearance or land disturbance that is allowed on highly erodible land shall either: I) not significantly increase the risk of erosion or land stability; or ii) have acceptable standards in whole farm business plans and renewable energy development plans to ensure no substantial increase in erosion risk.</p> <p>Any consequential amendments necessary to give effect to this submission</p>	Reject
	X 511	133	TRUST POWER LIMITED - Support	Reject
MINISTER OF CONSERVATION	372	23	Retain policy as written.	Accept in part
	X 506	9	MANAWATU BRANCH OF N Z GREEN PARTY - Support	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
	X 511	135	TRUST POWER LIMITED - Oppose	Reject
	X 522	456	MERIDIAN ENERGY LIMITED - Oppose	Reject
DANIEL WEBB	378	2	I can only suggest that it needs to be taken right out as this will be impossible to police and is Horizons going to prosecute every hill country farmer? The District plan has provisions to prosecute stupidity. Horizons should adopt an education and advisory approach on this matter	Reject
ENVIRONMENTAL WORKING PARTY	386	54	We seek the following decision from the Regional Council - that the following amendment is made to this provision in the form of an addition: (c) all activities will take into consideration the objectives and policies of Chapter 4. (d) in the discovery of koiwi (bones) and/or any artifacts, all activities will cease, the Regional Council and local Maori will be contacted immediately.	Accept in part
ALFRED JAMES SIVYER	387	3	No specific decision requested, however submitter notes their opposition to this provision.	Reject
ALFRED JAMES SIVYER	387	9	No specific decision requested, However submitter notes their opposition to this provision	Reject
MICHAEL GEORGE PETERSEN	399	3	Removal of the personal impositions of qualifying for the Farm Business Plan in favour of a friendly and affordable scheme based on education and healthy sustainability of the community.	Reject
TARANAKI FISH & GAME COUNCIL	406	8	Retain this section	Accept
	X 485	1	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Accept
NEW ZEALAND INSTITUTE OF FORESTRY	419	4	Amend policy 5-3 to ensure that the policy of "generally not allowing" vegetation clearance and land disturbance on Highly Erodible land only applies to that land which is in fact highly erodible, as opposed to the blanket area shown on the map in Appendix A. Alternatively amend the mapping of highly erodible land as requested under our submission "Schedules General.	Accept in part
	X 501	245	ERNSLAW ONE LTD - Support	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
	X 520	117	N Z FOREST MANAGERS LTD - Support	Accept in part
FEDERATED FARMERS OF NEW ZEALAND INC	426	32	Delete policy 5.3. Re-draft to state the effects of accelerated erosion which are to be avoided on highly erodible land.	Reject
	X 506	39	MANAWATU BRANCH OF N Z GREEN PARTY - Oppose	Accept
	X 511	136	TRUST POWER LIMITED - Support	Reject
NGA PAE O RANGITIKEI	427	54	We seek the following decision from the Regional Council - that the following amendment is made to this provision in the form of an addition: (c) all activities will take into consideration the objectives and policies of Chapter 4. (d) in the discovery of koiwi (bones) and/or any artifacts, all activities will cease, the Regional Council and local Maori will be contacted immediately.	Reject
	X 525	151	GENESIS POWER LTD - Oppose	Accept
GRANT ADKINS	428	1	Complete compensation must be paid to any landowners who are forced to retire land.	Reject
LANDLINK LTD	440	28	Insert into policy 5-3 (vii) The activity is for carbon farming under any national or international carbon trading frame work or agreement to produce carbon credits.	Reject
GEORGE R ROSS	441	2	Policy 5.3 (b) Vegetation Clearance and Land Disturbance on HEL - Delete "that is allowed".	Reject
TIM MATTHEWS	445	2	Change Policy 5-3 to "Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way."	Reject
	X 531	49	HORTICULTURE NEW ZEALAND - Support	Reject
TIM MATTHEWS	445	3	1. Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			<p>minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.</p> <p>2. Council undertakes a section 32 (RMA) analysis sufficient to identify cost and benefits in dollar terms, to adequately measure the impacts of the proposed regime, and the benefits of the policies, regulations and intent of the Proposed OnePlan, particularly in terms of section 5 (2) of the RMA.</p> <p>3. Council withdraws the proposed provisions of the OnePlan relating to regulation of activities on H.E.L. until: (a) Sufficient evidence of significant adverse effects are occurring from farm activities is documented, and (b) HEL has been more accurately defined and notified to land owners, and (c) Reasonable rules to address identified significant adverse effects have been developed in consultation with land owners and managers.</p>	
WANGANUI PROVINCE OF FEDERATED FARMS INC	446	2	Change Policy 5-3 to "Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way."	Reject
	X 506	7	MANAWATU BRANCH OF N Z GREEN PARTY - Oppose	Accept
WANGANUI PROVINCE OF FEDERATED FARMS INC	446	3	<p>1.Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.</p> <p>2.Council undertakes a Section 32 (RMA) analysis sufficient to identify costs and benefits in dollar terms, to adequately measure the impacts of the proposed regulatory regime, and the benefits of the policies, regulations and intent of the Proposed OnePlan, particularly in terms of Section 5 (2) of the RMA.</p> <p>3.Council withdraws the proposed provisions of the OnePlan relating to</p>	Reject

Submitter	Number	Point	Decision Sought	Recommendation
DAVID AISLABIE ON BEHALF OF THE WHANGANUI BRANCH OF THE GREEN PARTY	451	6	<p>regulation of activities on H. E. L. until :</p> <p>(a)sufficient evidence of significant adverse effects are occurring from farm activities is documented, and</p> <p>(b)HEL has been more accurately defined and notified to land owners, and</p> <p>(c)reasonable rules to address identified significant adverse effects have been developed in consultation with land owners and managers.</p> <p>(a) iii No specific decision requested but submits that this particular exception to land disturbance on Highly Erodible Land not generally being allowed is far too easy to abuse. Allowing tracking "for the purpose of establishing or maintaining a fence line or other infrastructure" is a loophole that you could drive a D8 bulldozer through!</p>	Reject
	X 523	8	TRANSPower NEW ZEALAND LTD - Oppose	Reject
ROB KIRK & TIM MATTHEWS	453	2	Change Policy 5-3 to "Vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way."	Reject
ROB KIRK & TIM MATTHEWS	453	3	<p>1. Normal farm activities including vegetation clearance and land disturbance shall generally be allowed on HEL unless there are more than minor adverse effects, which are unable to be mitigated, avoided, remedied or offset in any way.</p> <p>2. Council undertakes a section 32 (RMA) analysis sufficient to identify cost and benefits in dollar terms, to adequately measure the impacts of the proposed regime, and the benefits of the policies, regulations and intent of the Proposed OnePlan, particularly in terms of section 5 (2) of the RMA</p> <p>3. Council withdraws the proposed provisions of the OnePlan relating to regulation of activities on H.E.L. until: (a) Sufficient evidence of significant adverse effects are occurring from farm activities is documented, and</p>	Reject

Submitter	Number	Point	Decision Sought	Recommendation
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	20	(b) HEL has been more accurately defined and notified to land owners, and (c) Reasonable rules to address identified significant adverse effects have been developed in consultation with land owners and managers. No decision requested, however submitter notes: This is a reasonable and well articulated policy - support all	Accept
	X 506	8	MANAWATU BRANCH OF N Z GREEN PARTY - Support	Accept

4.10.1 Summarise submission points

- (a) Submitters request that land disturbance and vegetation clearance are allowed on HEL unless there are more than minor adverse effects.
- (b) Submitters seek amendment to the definition of vegetation clearance to enable the clearance of ferns, thistles and other small weed species.
- (c) Submitters request that the policy is redrafted to state the effects of accelerated erosion (426/32).
- (d) Provide an exception in the policy to allow significant increase in the risk of erosion as a result of creating and maintaining infrastructure (eg. 358/24 and 363/55).
- (e) Submitter 419/4 requests clarification that the land subject to the policy is actually HEL, not all land shown in Schedule A.
- (f) Submitters request that vegetation clearance be enabled for the purposes of maintaining infrastructure (eg. 36/2 and 359/38).
- (g) Submitters 4218/1 and 399/3 consider that the costs of WFBP implementation is too high or that an alternative education method is more appropriate.
- (h) Submitters request that the definition of HEL is amended.
- (i) Submitter (356/23) requests a definition of an operative WFBP.
- (j) Submitter 386 seeks the inclusion of reference to objectives and policies elsewhere in the chapter and reference to discovery of koiwi or artefacts.
- (k) Submitter 363/56 request the deletion of the words 'and there is no reasonable alternative location' from (iii).
- (l) Submitter 441/2 requests deletion of the words 'that is allowed' from (b).
- (m) Submitters request deletion of the word 'significantly' from (b).
- (n) Submitter 330/28 requests that the word 'fenceline' is replaced with 'essential facilities or activities'.
- (o) Several submitters express general opposition to the provision (eg. 246/9 and 387/3).
- (p) Submitters request clarification of the application of the policy to commercial forests (eg. 310/10 and 331/10).

- (q) Several submitters provide general support for the provision.
- (r) Some submitters have raised questions about the adequacy of the s32 evaluation undertaken by Horizons in relation to regulation of activities on HEL (453/3, 445/3 and 446/3).

4.10.2 Evaluation

Several of the issues raised by submitters in this section of the POP are the same as or similar to issues addressed elsewhere in this report (eg. appropriateness of s32 cost benefit evaluation and definition of HEL). I will not address those matters again at this point.

The policy reinforces the important relationship vegetation clearance and land disturbance have with accelerated erosion in HEL. The evidence of John Dymond, Jon Roygard, Alec McKay and Allan Kirk all touch on changes that need to be brought about in land use practice to resolve the current level of unsustainable land use. The POP has been written to discourage unsustainable land use practices (via rules and other methods) and to encourage the adoption of more sustainable practices (via WFBPs).

The current wording of the policy does not remove the opportunity for vegetation clearance and land disturbance on HEL. However it does provide a clear indication that such practices that are likely to result in accelerated erosion are strongly discouraged. The policy, as currently worded, recognises that land uses that appropriately consider and manage the impacts of any necessary vegetation clearance or land disturbance are appropriate. These types of activities are either listed in the policy or will be classified as other exceptional circumstances as provided for in (b). The use of the word 'generally' in the policy also provides for a degree of discretion where there is sufficient evidence to show that the proposed activity is achieving the outcomes intended by the POP. 'Generally' also makes it possible for the Council to enable some vegetation clearance and land disturbance activities via rules in the RP section of the POP and via resource consent. Clause (b) of the policy provides clear direction that if such activities are allowed, must be at a scale or undertaken in a way that does not significantly increase the risk of erosion or land stability. I consider that the policy, as currently worded, reinforces the clear message that the objectives of the POP have set – that the long term goal is sustainable management and until that goal is reached unsustainable activities are controlled in order to make the current situation no worse. I believe this policy enables some limited level of vegetation clearance and land disturbance on HEL in carefully controlled circumstances or to enable land use activities that have no more than minor effects to be undertaken.

The ability to establish and maintain infrastructure of regional and national importance such as strategic roads, railway lines, telecommunication, electricity transmission/generation facilities and other infrastructure is important for communities to provide for their well-being and their health and safety. This infrastructure is specifically defined in Policy 3-1(a) in Chapter 3 – Infrastructure, Energy and Waste. In addition to the regionally and nationally important infrastructure, the ability to maintain non-strategic public roads is also considered to be important for local communities to function effectively. Pruning and removal of vegetation that impairs the operation of infrastructure is not expected to have significant impacts on erosion as it will tend to be localised. Also maintaining

the vegetation at a consistent level/extent that has already been established when the infrastructure was put in place is considered to be unlikely to cause any additional adverse effects in terms of accelerated erosion. I therefore recommend an amendment to Policy 5-3 to clarify that the infrastructure referred to is infrastructure of regional and national importance as defined in Policy #-1(a). To ensure that the maintenance of public roads is enabled, I also recommend that Policy 5-3 refer specifically to those roads. I further recommend to include in the definition of vegetation clearance in the Glossary specific exclusions for vegetation clearance undertaken for the maintenance of infrastructure of regional and national significance and also for the maintenance of existing formed public roads to give effect to this change in Policy 5-3.

The definition of vegetation clearance currently encompasses almost all vegetation. Three exceptions are provided, including grazing, pruning or thinning of forestry and the control of pest plants. Currently the definition includes activities such as clearing non-Regional Pest Plant Management Strategy pests such as thistle and other pasture pests. Continued sustainable use of land in pasture could be jeopardised by not being able to clear these species, which themselves provide minimal benefit in terms of prevention accelerated erosion. It is therefore appropriate to amend the definition of ‘vegetation clearance’ in the POP to enable the clearance of non-woody vegetation such as pest plants.

The operative Land and Water Regional Plan includes the following definition of vegetation clearance:

*“Vegetation clearance means the destruction of vegetation by any means, including cutting, burning, clearing or spraying; and **includes** clear felling of forest; and line clearance by bulldozer or similar machine for fences or planting; but **excludes** clearance of agricultural and horticultural crops, pasture, forest thinning or coppicing, or any plant defined as a plant pest; or clearance of tracks for the use of foot traffic only; or any clearance for the purposes of a recognised river control scheme or any clearance for the normal maintenance of existing roads, tracks, fire water points, fence lines, railway lines and public utility networks; or the clearance of isolated or scattered manuka or kanuka regrowth on productive pasture; or clearance associated with authorised river crossings; or the clearance of any indigenous vegetation understorey beneath plantation forest.
 (Note: Maintenance of existing roads, tracks, fire water points, fence lines, railway lines and public utility networks includes the trimming of adjacent vegetation; but does not include vegetation clearance for new installations, roads, or access ways.)”*

While some of the matters covered in the above definition are now addressed through specific rules in the POP (eg. works associated with river control schemes), I consider it useful to adapt this definition to the POP to address matters raised by several submitters, including in relation to the management of plant pests. As such, I propose the following definition of vegetation disturbance (underlined sections include proposed additions to the existing proposed definition):

Vegetation clearance means the cutting, crushing, spraying, burning or other means of removal of vegetation, including indigenous and exotic plants. It does not include:

(a) Grazing

- (b) *Pruning or thinning operations associated with production forestry*
- (c) *The control of pest plants as defined in the Regional Pest Plant Management Strategy*
- (d) *The control of other plants not included in the Regional Pest Plant Management Strategy where those plants are less than 2 years old, are not within a Rare or Threatened Habitat* or At Risk habitat* and have established as a result of natural dispersion.*
- (e) *Vegetation clearance for the maintenance of infrastructure* of regional or national importance as defined in Policy 3-1(a).*
- (f) *Vegetation clearance for the maintenance of existing formed public roads.*

Proposed points (e) and (f) are explained in the paragraphs above.

I propose inserting point (d) as it enables naturally spread plants such as thistle, manuka, kanuka, carpet fern, etc to be controlled. However by including a limit on the maximum age of the vegetation to which the provision applies, the clearance of more established vegetation that is likely to be contributing to the control of erosion is controlled by rules within Chapter 12. While the 2-year age is a somewhat arbitrary number, it recognises that productive and sustainable land is likely to be regularly maintained in a cleared state. Including the reference to natural dispersion eliminates the possibility of areas of vegetation planted for erosion management purposes from being removed.

This proposed amendment, while within the scope of submissions, has not been discussed with submitters prior to this report being prepared and it would therefore be appropriate for any submitters with concerns about this proposed definition to address those concerns to the hearing for further discussion.

The policy does not refer to 'operative' WFBPs. It does refer to the POP becoming operative. No changes are considered necessary.

Additional reference to other objectives and policies in the chapter and to matters relating to the discovery of koiwi and artefacts is not considered necessary. There is an inherent relationship between the provisions within the Land chapter. There is also a relationship within the POP between the provisions of the various chapters and the rules and other methods. The rules in Chapter 12, which relate to land use activities, already contain provisions for the management of koiwi and artefact discoveries. No additional reference is considered necessary.

Deletion of the words 'and there is no reasonable alternative location' from (iii) is not considered appropriate. The intention of this clause is to only enable activities on HEL where more appropriate locations for the activity have been explored and found to be inappropriate. This is a logical consideration prior to establishing an activity that has the potential to cause significant adverse effects.

Clause (b) of the policy relates only to those activities that have been allowed via (a). To broaden the clause to all activities by removing 'that is allowed' would undermine (a) by implying that activities other than those allowed by (a) may be appropriate. I do not consider the requested change would improve the clarity or intent of the policy. Deleting the word 'significantly' from (b) would remove the capacity for activities to occur that may cause adverse effects albeit minor adverse effects. The word 'significantly' signals that the maximum level of effects allowed are those of a minor degree.

Replacing 'fencelines' in (a)(iii) with 'essential facilities or activities' would add a significant degree of uncertainty to the provision, with no definition of what essential facilities and activities include. The submitter may wish to expand on the intent of this proposed change at the hearing, but I am not aware of activities other than fencelines and infrastructure (which is already defined in the POP) that would need to be specified at a policy level. I therefore consider it appropriate to retain specific provision for fencelines in the policy.

The policy enables the establishment of commercial forestry operations ((a)(v)). The phrase 'commercial forestry operations' implies more than simply planting – it would suggest that for a forestry operation to be commercial there must be a means of harvesting the timber. I consider that the policy could be clarified by adding the words 'and undertaking' after the word 'establishing' to recognise that the policy intends that forests are harvested in accordance with accepted industry standards.

4.10.3. Recommendation

Accept in part submissions seeking vegetation clearance and land disturbance associated with infrastructure maintenance.

Reject submissions that request that land disturbance and vegetation clearance are allowed on HEL unless there are more than minor adverse effects.

Accept in part submissions that seek amendment to the definition of vegetation clearance to enable the clearance of ferns, thistles and other small weed species.

Reject submissions request that the policy is redrafted to state the effects of accelerated erosion (426/32).

Reject submissions that request an exception in the policy to allow significant increase in the risk of erosion as a result of creating and maintaining infrastructure (eg. 358/24 and 363/55).

Accept in part 419/4 requests clarification that the land subject to the policy is actually HEL, not all land shown in Schedule A.

Accept in part request that vegetation clearance be enabled for the purposes of establishing and maintaining infrastructure (eg. 36/2 and 359/38).

Reject 4218/1 and 399/3 consider that the costs of WFBP implementation are too high or that an alternative education method is more appropriate.

Accept in part request that the definition of HEL is amended.

Reject request for a definition of an operative WFBP.

Reject submissions seeking the inclusion of reference to objectives and policies elsewhere in the chapter and reference to discovery of koiwi or artefacts.

Reject submissions that request the deletion of the words ‘and there is no reasonable alternative location’ from (iii).

Reject submission that requests deletion of the words ‘that is allowed’ from (b).

Reject submissions that request deletion of the word ‘significantly’ from (b).

Reject submission that requests that the word ‘fenceline’ is replaced with ‘essential facilities or activities’.

Reject submissions that express general opposition to the provision (eg. 246/9 and 387/3).

Accept in part submissions that request clarification of the application of the policy to commercial forests (eg. 310/10 and 331/10).

Accept submissions that provide general support for the provision.

Reject submissions that have raised questions about the adequacy of the s32 evaluation undertaken by Horizons in relation to regulation of activities on HEL (453/3, 445/3 and 446/3).

4.10.3.1 Recommended changes to provision

Amend Policy 5-3(a)(v) by adding the words ‘and undertaking’ after the word ‘establishing’.

Amend Policy 5-3(a)(iii) to: (iii) the activity is for the purpose of establishing or maintaining a fenceline ~~or other infrastructure*~~ and there is no reasonable alternative location.

Amend Policy 5-3(a) by adding a new sub clause (vii): (vii) the activity is for the purpose of establishing or maintaining infrastructure of regional and national importance as defined in Policy 3-1(a) and there is no reasonable alternative location.

(v) the activity is for the purpose of establishing and undertaking a commercial forestry operation that will operate in accordance with accepted industry standards.

Amend the definition of ‘vegetation clearance’ in the glossary to the following:

Vegetation clearance means the cutting, crushing, spraying, burning or other means of removal of vegetation, including indigenous and exotic plants. It does not include:

- (a) Grazing*
- (b) Pruning or thinning operations associated with production forestry*
- (c) The control of pest plants as defined in the Regional Pest Plant Management Strategy*
- (d) The control of other plants not included in the Regional Pest Plant Management Strategy where those plants are less than 2 years old and have established as a result of natural dispersion.*

- (e) Vegetation clearance for the maintenance of infrastructure* of regional or national importance as defined in Policy 3-1(a).
- (f) Vegetation clearance for the maintenance of existing formed public roads.

4.11 Recommendation Land 11 Chapter 5 Policy 5-4 Regulation of significant disturbance on land that is not highly erodible land

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
BERT JUDD	96	6	Keep heavy stock off high and steep country and replant with hybrid willows as they have rapid growth, good root structure to cling to rock shale plus also giving great shelter. Open up tree nurseries again and cloning a must and subsidise farmers	Reject
DEAN ROBERT SHERSON	158	2	It does not identify the proportion, scale or intensity of HEL on a particular property. Land owners cannot readily identify HEL on their property	Accept in part
	X 495	95	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
BRIAN DOUGLAS SHERSON	159	1	It does not identify the proportion, scale or intensity of HEL on a particular property. Land owners cannot readily identify HEL on their property	Accept in part
	X 495	94	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
ON TRACK (N Z RAILWAYS CORPORATION)	161	4	ONTRACK supports Policies 5.4 and would like to be involved in developing best management processes.	Reject
RUAPEHU FEDERATED FARMERS OF NEW ZEALAND INC	246	10	Delete Policy 5.4	Reject

Submitter	Number	Point	Decision Sought	Recommendation
HORTICULTURE NEW ZEALAND	357	51	Decision Sought: Amend Policy 5-4 by adding 'Significant' at the commencement of the policy.	Reject
	X 511	139	TRUST POWER LIMITED - Support	Reject
TRUST POWER LIMITED	358	25	Retain Policy 5-4, Regulation of significant land disturbance on land that is not Highly Erodible Land, as read. Any similar provisions to like effect. Any consequential amendments that stem from the retention of Policy 5-4 as proposed in this submission.	Accept in part
MIGHTY RIVER POWER	359	39	Retain policy as notified.	Accept in part
	X 511	137	TRUST POWER LIMITED - Support	Accept in part
DANIEL WEBB	378	3	I can only suggest that it needs to be taken right out as this will be impossible to police and is Horizons going to prosecute every hill country farmer? The District plan has provisions to prosecute stupidity. Horizons should adopt and education and advisory approach on this matter	Reject
ENVIRONMENTAL WORKING PARTY	386	55	We seek the following decision from the Regional Council - that the following amendment is made to this provision in the form of an addition: (c) all activities will take into consideration the objectives and policies of Chapter 4. (d) in the discovery of koiwi (bones) and/or any artifacts, all activities will cease, the Regional Council and local Maori will be contacted immediately.	Reject
ALFRED JAMES SIVYER	387	7	No specific decision requested, However submitter notes their opposition to this provision	Reject
ALISON MARGARET MILDON	401	64	Policy 5-4 Regulation of significant land disturbance on land that is not HEL (Land disturbance on land that is not Highly Erodible Land shall be regulated in order to avoid any significant increases in the risk of erosion, land instability, or sediment discharges to waterways.) To Read Land disturbance on land that is not Highly Erodible Land shall be regulated	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			in order to avoid increases in the risk of erosion land instability, or sediment discharges to waterways.	
	X 527	381	TARARUA - AOKAUTERE GUARDIANS INC (T A G) - Support	Reject
TARANAKI FISH & GAME COUNCIL	406	9	Retain this section	Accept
	X 492	70	MINISTER OF CONSERVATION - Support	Accept
FEDERATED FARMERS OF NEW ZEALAND INC	426	33	Reword Policy 5-4 as follows: "Land disturbance on land that is not highly erodible land shall be managed by a range of methods, in order to avoid any significant increase in the risk of erosion, land instability or sediment discharges to waterways". (or words to that effect)	Accept in part
	X 484	78	MINISTRY OF AGRICULTURE & FORESTRY - Support	Accept in part
	X 506	42	MANAWATU BRANCH OF N Z GREEN PARTY - Oppose	Reject
	X 511	138	TRUST POWER LIMITED - Oppose	Reject
	X 531	51	HORTICULTURE NEW ZEALAND - Support	Accept in part
NGA PAE O RANGITIKEI	427	55	We seek the following decision from the Regional Council - that the following amendment is made to this provision in the form of an addition: (c) all activities will take into consideration the objectives and policies of Chapter 4. (d) in the discovery of koiwi (bones) and/or any artifacts, all activities will cease, the Regional Council and local Maori will be contacted immediately.	Reject
	X 525	152	GENESIS POWER LTD - Oppose	Reject
TIM MATTHEWS	445	4	The Plan Policies and consequent rules be amended to permit normal farm activities to occur without consent, particularly where no significant or only temporary adverse effects occur.	Accept in part
	X 495	96	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
WANGANUI PROVINCE OF FEDERATED FARMS INC	446	4	The Plan Policies and consequent rules be amended to permit normal farm activities to occur without consent, particularly where no significant, or only	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
			temporary adverse effects occur.	
	X 495	97	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
ROB KIRK & TIM MATTHEWS	453	4	The Plan Policies and consequent rules permit normal farm activities to occur without consent, particularly where no significant or only temporary adverse effects occur.	Accept in part
	X 495	98	RUAPEHU DISTRICT COUNCIL - Support	Accept in part

4.11.1 Summarise submission points

- (a) Amend policies and rules to permit normal farming activities.
- (b) Add the word 'significant' to beginning of policy.
- (c) Insert cross references to other sections in the POP.
- (d) Amend definition of HEL.
- (e) Remove the word 'significantly' prior to the word 'increases'.
- (f) General opposition to the policy.
- (g) General support for the policy.

4.11.2 Evaluation

As discussed in the previous section of this report, the current policy framework enables farming activities where they do not cause adverse effects. I consider the wording of this policy is consistent with this approach and need not be altered.

Adding the word 'significant' to beginning of policy is not considered necessary. The policy is intended to control all land uses which may have significant effects. 'Significant' land uses may be limited to land uses that are significant in physical size, but this does not always equate to the scale of the effects resulting from the activity.

As has been discussed in previous sections of this report, I do not consider it necessary to provide specific links from this chapter to the Te Ao Maori chapter. The provisions of the Te Ao Maori chapter are incorporated into the RP section of the POP through rules and standards as well as via methods.

As previously discussed, I consider that is appropriate to amend the definition of HEL. This will assist property owners in determining whether parts of their property are HEL or otherwise.

Removing the word 'significantly' prior to the word 'increases' in the policy is not considered appropriate. As discussed in the previous section, the word significantly indicates that effects up to a minor level are considered acceptable. To remove the word would result in a policy that was unachievable except by way of completely ceasing land use activities.

This submissions proposing general opposition to the policy suggest no alternative relief. Therefore I do not consider any amendments to the policy are necessary.

4.11.3 Recommendation

Reject submissions that seek to amend policies and rules to permit normal farming activities.

Reject the submission that requests adding the word 'significant' to beginning of policy.

Reject submissions requesting cross references to other sections in the POP.

Accept in part submissions requesting amendment to the definition of HEL.

Reject submissions requesting removal of the word 'significantly' prior to the word 'increases'.

Reject submissions in general opposition to the policy.

Accept submissions in general support for the policy.

4.11.4.1 Recommended changes to provision

None. Amendments to the definition of HEL are addressed in the section of this report that deals with Schedule A.

4.12 Recommendation Land 12 Chapter 5 Policy 5-5 Codes of practice and best management practices

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
ON TRACK (N Z RAILWAYS CORPORATION)	161	5	ONTRACK supports Policies 5.5 and would like to be involved in developing best management processes.	Reject
SNOW COUNTRY GARDENS LTD	178	2	That the 1) The Soil and Water management Waimarino District -Better Management Practice Guidelines and 2) NZGAP - Hort NZ's approved Supplier Programme be incorporated into regulatory framework of the One Plan so that market gardening in the Water Management Zones Whau_3b, Whau_3c and Whau_3d be a permitted activity.	Reject
RUAPEHU FEDERATED FARMERS OF NEW ZEALAND INC	246	11	Delete Policy 5.5 (b)	Reject
P F OLSEN LIMITED	305	3	1.Allocate some resources toward ensuring land and water based biodiversity data and mapping is available to industry for incorporation into Company GIS systems at little of no cost.	
	X 501	101	ERNSLAW ONE LTD - Support	
	X 520	16	N Z FOREST MANAGERS LTD - Support	
P F OLSEN LIMITED	305	4	2.Create a web portal or disk for use by small scale players where the classifications and associated data can be easily scaled and matched against cadastral boundaries.	Reject
	X 495	99	RUAPEHU DISTRICT COUNCIL - Support	Reject
	X 501	106	ERNSLAW ONE LTD - Support	Reject
	X 520	17	N Z FOREST MANAGERS LTD - Support	Reject
P F OLSEN LIMITED	305	5	3.Consider working with industry to create a small compact set of specific requirements applicable to defined catchment/geological conditions that combined with the Forestry Environmental Code form the basis of permitted activity status subject to rules.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 501	107	ERNSLAW ONE LTD - Support	Reject
	X 520	18	N Z FOREST MANAGERS LTD - Support	Reject
P F OLSEN LIMITED	305	6	4.Look at revising the extent to which controlled consent is required given the above.	Reject
	X 501	108	ERNSLAW ONE LTD - Support	Reject
	X 520	19	N Z FOREST MANAGERS LTD - Support	Reject
RAYONIER N Z LIMITED	310	6	Recognition and endorsement by Horizons of the New Zealand Environmental Code of Practice for Plantation Forestry V1 developed by the New Zealand Forest Owners Association.	Reject
	X 501	132	ERNSLAW ONE LTD - Support	Reject
	X 520	43	N Z FOREST MANAGERS LTD - Support	Reject
RAYONIER N Z LIMITED	310	8	Recognition and endorsement by Horizons of the New Zealand Environmental Code of Practice for Plantation Forestry V1 developed by the New Zealand Forest Owners Association.	Reject
	X 501	134	ERNSLAW ONE LTD - Support	Reject
	X 520	45	N Z FOREST MANAGERS LTD - Support	Reject
NEW ZEALAND DEFENCE FORCE	330	29	1.Retain Policy 5-5 and include a new policy (5-5d) committing Horizons to adopt accepted COP in a timely and effective manner.	Reject
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	11	Retain and give effect to Policy 5.5 through reference to the NZFOA Environmental Code of Practice for Plantation Forestry in the rules in section 12 of the plan.	Accept in part
	X 501	151	ERNSLAW ONE LTD - Support	Accept in part
	X 520	65	N Z FOREST MANAGERS LTD - Support	Accept in part
TRANSIT NEW ZEALAND	336	18	That this policy be retained and that Council recognise Transits various codes of practice and best management practices as being appropriate to ensure that any adverse effects arising from state highway maintenance and construction works are avoided, remedied or mitigated. Transit would like to work with Council to ensure that its	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			various codes of practice and other good practice initiatives will provide an environmental benefit to the region.	
	X 502	85	NEW ZEALAND DEFENCE FORCE - Support	Reject
MANAWATU DISTRICT COUNCIL	340	34	Include the material from Policies 5-5 in Part II of the One Plan, probably in Chapter 12.	Reject
	X 481	590	PALMERSTON NORTH CITY COUNCIL - Support	Reject
ENVIRONMENT NETWORK MANAWATU	356	25	No decision requested, however submitter notes: ENM remain concerned over the lack of clarity regarding their (codes of practice) legal status (see general comments).	Reject
HORTICULTURE NEW ZEALAND	357	52	Decision Sought: Retain Policy 5-5.	Accept
MIGHTY RIVER POWER	359	40	Retain policy as proposed.	Accept
	X 502	87	NEW ZEALAND DEFENCE FORCE - Support	Accept
	X 511	140	TRUST POWER LIMITED - Support	Accept
RAVENSDOWN FERTILISER CO-OPERATIVE LIMITED	379	8	Ravensdown seeks Council to address its concerns regarding Farm Plans as outlined in other parts of this submission.	Reject
ENVIRONMENTAL WORKING PARTY	386	52	We seek the following decision from the Regional Council - that the following amendment is made to this provision in the form of an addition: (d) Resource consent applicants are required to undertake remedial action to rectify adverse effects to environs. (e) The Regional Council will lobby the relevant legislative bodies to impose penalties for non compliance that: i) are appropriate to the adverse environmental effects ii) account for the remedial process, and iii) will act as a deterrent for those intending not to comply. (f) The relevant Maori/ iwi and/or hapu organisation shall be notified of any disturbance to sites of significance for Maori (g) The relevant Maori/ iwi and/or hapu organisation shall be notified of any discovery of koiwi (bones) or artifacts and any type of activity shall	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			stop until the appropriate processes have been completed.	
	X 502	88	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
ENVIRONMENTAL WORKING PARTY	386	56	We seek the following decision from the Regional Council - that the following amendment is made to this provision in the form of an addition: (c) all activities will take into consideration the objectives and policies of Chapter 4. (d) in the discovery of koiwi (bones) and/or any artifacts, all activities will cease, the Regional Council and local Maori will be contacted immediately.	Reject
ALFRED JAMES SIVYER	387	8	No specific decision requested, However submitter notes their opposition to this provision	Reject
TARANAKI FISH & GAME COUNCIL	406	10	Retain this section	Accept
	X 502	86	NEW ZEALAND DEFENCE FORCE - Support	Accept
NEW ZEALAND FERTILISER MANUFACTURERS RESEARCH ASSOCIATION INCORPORATED	415	6	Fert Research supports development of codes of practice and best management practices, and requests that the intent and approach with respect to these initiatives be retained.	Accept in part
NEW ZEALAND FERTILISER MANUFACTURERS RESEARCH ASSOCIATION INCORPORATED	415	7	The council look to more strongly supporting these initiatives by including them as requirements for permitted activity status and including web site links.	Reject
FISH & GAME NEW ZEALAND - WELLINGTON REGION	417	14	Amend Objective 5-1(a) as suggested.	Accept in part
NEW ZEALAND INSTITUTE OF FORESTRY	419	5	Retain and give effect to Policy 5-5 through rules in the plan.	Accept
	X 501	246	ERNSLAW ONE LTD - Support	Accept
	X 502	84	NEW ZEALAND DEFENCE FORCE - Support	Accept

Submitter	Number	Point	Decision Sought	Recommendation
	X 520	118	N Z FOREST MANAGERS LTD - Support	Accept
FEDERATED FARMERS OF NEW ZEALAND INC	426	34	Amend 5.4.2 as follows: "Where appropriate, codes of practice targeted at achieving sustainable land use will be recognised within the regulatory framework" (or words to that effect)"	Reject
	X 506	40	MANAWATU BRANCH OF N Z GREEN PARTY - Oppose	Accept
	X 511	142	TRUST POWER LIMITED - Support	Reject
NGA PAE O RANGITIKEI	427	52	We seek the following decision from the Regional Council - that the following amendment is made to this provision in the form of an addition: (d) Resource consent applicants are required to undertake remedial action to rectify adverse effects to environs. (e) The Regional Council will lobby the relevant legislative bodies to impose penalties for non compliance that: i) are appropriate to the adverse environmental effects ii) account for the remedial process, and iii) will act as a deterrent for those intending not to comply. (f) The relevant Maori/ iwi and/or hapu organisation shall be notified of any disturbance to sites of significance for Maori (g) The relevant Maori/ iwi and/or hapu organisation shall be notified of any discovery of koiwi (bones) or artifacts and any type of activity shall stop until the appropriate processes have been completed.	Reject
	X 502	89	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
NGA PAE O RANGITIKEI	427	56	We seek the following decision from the Regional Council - that the following amendment is made to this provision in the form of an addition: (c) all activities will take into consideration the objectives and policies of Chapter 4. (d) in the discovery of koiwi (bones) and/or any artifacts, all activities will cease, the Regional Council and local Maori will be contacted immediately.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 525	153	GENESIS POWER LTD - Oppose	Accept
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	21	Support all but advocate non-industry involvement in the development of codes of practice.	Accept in part
	X 506	4	MANAWATU BRANCH OF N Z GREEN PARTY - Support	Accept in part
	X 511	141	TRUST POWER LIMITED - Support	Accept in part

4.12.1 Summarise submission points

- (a) Incorporate the Soil and Water Management Waimarino District – Better Management Practice Guidelines and Transit’s various codes of practice into the regulatory framework. Also recognition and endorsement of the New Zealand Environmental Code of Practice for Plantation Forestry V1.
- (b) Amend wording of (b)
- (c) Include requirement for Horizons to consider and adopt COPs in a timely manner.
- (d) Include cross-references to other chapters.
- (e) General opposition to the provision.
- (f) General amendments to the policy (427/52 and 386/52).
- (g) Requests relating to provision of information by Horizons.
- (h) General support for the provision.

4.12.2 Evaluation

Submitters requesting the recognition and incorporation of specific codes of practice that are not already included in the POP need to approach Horizons to discuss the appropriateness of these codes of practice. Representatives of the forestry sector have met several times with Horizons staff to discuss the inclusion of the New Zealand Environmental Code of Practice for Plantation Forestry V1 into the POP to support permitted activity forestry operations. Through these discussions, it is my understanding the Horizons have made it clear that the New Zealand Environmental Code of Practice for Plantation Forestry V1 does not currently meet the requirements of an appropriately developed code of practice suitable for inclusion in the POP. Horizons welcomes discussions with industry groups and individual businesses who wish to develop or use a particular code of practice. However I do not consider it appropriate to include COPs in the POP at this stage until they have been verified as having been appropriately developed. I

consider this applies also to the Water Management Waimarino District – Better Management Practice Guidelines which appear to be guidelines only rather than a code of practice.

Amending the wording of (b) to begin ‘where appropriate’, would not seem to make the provision or the intent of the policy any clearer.

Submitter 330/29 requests the inclusion of a requirement for Horizons to consider and adopt COPs in a timely manner. I do not consider this as necessary as Horizons has a general duty under s21 of the RMA to avoid unreasonable delay.

As discussed in previous sections of this report, I do not consider it necessary to cross-references to the Te Ao Maori chapter in the POP.

Submitters expressing general opposition to the provision do not request any specific relief or changes to the submissions. Therefore I do not consider it appropriate to recommend any changes.

General amendments to the policy to take make specific reference to other objectives and policies in the chapter and to make specific provisions for koiwi or other discoveries has been discussed in previous sections of this report. I do consider that this policy requires such reference as other chapters and provisions provide sufficient guidance.

Submissions requesting methods for the provision of information by Horizons are outside the scope of the POP.

4.12.3 Recommendation

Reject submissions that seek to specific documents into the POP at this time.

Reject submission that seek to amend wording of (b)

Reject submissions that seek to include requirement for Horizons to consider and adopt COPs in a timely manner.

Reject submissions that request inclusion of cross-references to other chapters.

Reject submissions that express general opposition to the provision.

Reject submissions requesting general amendments to the policy (427/52 and 386/52).

Reject submissions relating to provision of information by Horizons.

Accept submissions that offer general support for the provision.

4.12.4.1 Recommended changes to provision

None.

4.13 Recommendation Land 13 Chapter 5 Method General

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
PALMERSTON NORTH CITY COUNCIL	241	46	That Horizons amend Section 5-5 Methods, to provide relief to the reservation about costs and benefits of SLUI expressed above.	Reject
	X 500	101	TARARUA DISTRICT COUNCIL - Support	Reject
	X 507	101	MANAWATU DISTRICT COUNCIL - Support	Reject
	X 515	101	HOROWHENUA DISTRICT COUNCIL – Support	Reject
	X 517	233	RANGITIKEI DISTRICT COUNCIL - Support	Reject
	X 532	101	WANGANUI DISTRICT COUNCIL - Support	Reject

4.13.1. Summarise submission points

(a) Amend Section 5-5 to reflect submitter's concerns about costs of SLUI.

4.13.2 Evaluation

Details and explanation of the costs associated with the SLUI programme is included in the evidence supporting this report. I refer the commissioners to that evidence and to previous sections of my report where the evaluation of the costs and benefits associated with the SLUI programme have been discussed. To summarise, I consider that a comprehensive evaluation of the costs of the SLUI programme have been undertaken by Horizons and that the inclusion of the WFBP component of that programme is appropriate for the POP.

4.13.3 Recommendation

Reject the submission requesting amendments to Section 5-5 to reflect submitter’s concerns about costs of SLUI.

4.13.3.1 Recommended changes to provision

None.

4.14 Recommendation Land 14 Chapter 5 Method Sustainable Land Use Initiative – Hill Country Erosion

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
SHARN HAINSWORTH	116	12	I also believe that detailed methodology for the various non-regulatory projects should also be included within the One Plan - not just summaries in table form. This includes a full and explicit outline of what is involved in a Sustainable Land Use Initiative (SLUI) Farm Plan - including the business accounts.	Reject
	X 495	101	RUAPEHU DISTRICT COUNCIL - Support	Reject
SHARN HAINSWORTH	116	13	I support the non-regulatory stance taken on farmers getting SLUI farm plans. I submit that this stance should be extended to all farmers.	Accept in part
	X 495	102	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
SHARN HAINSWORTH	116	16	There should also be an accreditation system set up with agencies such as Agriquality that can check that such plans are acceptable, to allay farmer concerns about having to open their books to the Horizons.	Reject
SHARN HAINSWORTH	116	17	Farms with SLUI farm plans or equivalent must be monitored. In particular I submit that every 5 years, or after a	Reject

Submitter	Number	Point	Decision Sought	Recommendation
SHARN HAINSWORTH	116	18	<p>1:100 year storm if happens earlier, the present erosion part of the New Zealand Land Resource Inventory (NZLRI) units should be reassessed. At the same time the impact of browsing animal pests on retired areas should be monitored.</p> <p>If they don't already SLUI plans should include a section on how to monitor the quality of water leaving the property. By water quality I don't mean the Stream Health Monitoring Kit (SHMAK) or Waiora, I mean taking samples in an appropriate manner and sending them to a laboratory for analysis, for P, sediment and bacteria levels. There should be simple calendars showing when to do this through the year, and Horizons should form a Memorandum of Understanding or other protocol with a laboratory to ensure that farmers can sign up with the lab and the results go both to the lab and to Horizons. Maybe the lab could send reminders to the farmers when its time to test. Horizons could even identify appropriate places for sampling to occur and include a map showing such in the SLUI farm plan.</p>	Reject
SHARN HAINSWORTH	116	19	<p>Horizons need to acknowledge that all farmers in its region are an important asset.</p> <p>I submit that Horizons needs to commission a report about the history of hill country farming from all the different communities that exist or have existed around the region. This report should focus on how environmental issues were related to social and economic issues.</p>	Reject
	X 495	103	RUAPEHU DISTRICT COUNCIL - Support	Reject
SHARN HAINSWORTH	116	20	I also submit that Horizons needs to focus on cost-efficient mapping which encourages farmer buy-in, in a process similar to that provided by the Soils Underpinning Business Success programme - as part of the SLUI concept.	Reject
SHARN HAINSWORTH	116	21	I submit that a more transparent and accessible forum needs to be established to allow a range of experts and	Reject

Submitter	Number	Point	Decision Sought	Recommendation
SHARN HAINSWORTH	116	23	<p>interested parties to have input on further development of the SLUI concept into the future.</p> <p>I also submit that the term "active management" as defined in the One Plan must be redefined - and broadened. It must also be recognised that sensitive landscapes being used for pastoral or production forestry uses can be looked after through "active management"</p> <p>I'm not saying that all that is now used should be farmed, but maybe we need to take our time and really ensure that farmers are the ones driving the decisions on how to get more sustainable.</p>	Reject
ON TRACK (N Z RAILWAYS CORPORATION)	161	6	ONTRACK would prefer a quicker response target than 2017 to establish farm business plans on Highly Erodible Land.	Reject
ON TRACK (N Z RAILWAYS CORPORATION)	161	7	ONTRACK would like to be involved in this project.	Reject
RUAPEHU FEDERATED FARMERS OF NEW ZEALAND INC	246	6	Promote the voluntary management of HEL by land owners and occupiers	Accept in part
	X 495	100	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
	X 495	50	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
POWERCO LIMITED	272	14	J1 - Recognition that there are links to Policies 5-1, 5-2, 5-3, 5-4 and 5-5.	Accept in part
POWERCO LIMITED	272	15	J2 - Refer Submission P for amended definition of "whole farm business plan"	Accept in part
CLAYTON & MICHELLE POTTS	361	5	<p>No decision requested but following objection raised</p> <p>The One Plan requirement of undertaking "Farm Plans" has undertones of a Big Brother attitude. We will not be part of any such plan where a council office controls what and how we farm our property.</p>	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			To us the One Plan is another opportunity for the council at the landowners' expense in regard to the amount of consents required for each activity.	
			There has been no indication as to what the cost of carrying out such a vast scheme will be particularly to the sector directly affected the most, the landowner	
ELAINE GUBB & MICHAEL SANDERSON	362	5	No decision requested but following objection raised	Reject
			The One Plan requirement of undertaking "Farm Plans" has undertones of a Big Brother attitude. We will not be part of any such plan where a council office controls what and how we farm our property.	
			To us the One Plan is another opportunity for the council at the landowners expense in regard to the amount of consents required for each activity.	
			There has been no indication as to what the cost of carrying out such a vast scheme will be particularly to the sector directly affected the most, the landowner	
BRUCE NOEL RHODES	368	2	Non requested but opposes any measures other than the Eurogap protocol	Reject
MINISTER OF CONSERVATION	372	24	Add 'Department of Conservation' to list of parties included in the 'Sustainable Land Use Hill Country' project.	Reject
	X 490	18	TARANAKI / WHANGANUI CONSERVATION BOARD - Support	Reject
	X 522	457	MERIDIAN ENERGY LIMITED - Oppose	Accept
	X 529	10	ENVIRONMENT NETWORK MANAWATU - Support	Reject
MINISTRY OF AGRICULTURE & FORESTRY	373	52	Retain Method in Section 5.5.	Accept

Submitter	Number	Point	Decision Sought	Recommendation
ARBOR MANAGEMENT LIMITED	391	5	The main tool the plan identifies for achieving this is the use of "Whole Farm Plans" with forestry being included as an integral part of these plans and Arbor Management supports this non regulatory initiative.	Accept in part
	X 501	216	ERNSLAW ONE LTD - Support	Accept in aprt
C R GRACE, M HURLEY, HINAU STATION LTD, DUNCAN LAND CO LTD, TE KUMU ESTATES LTD, OTAIRI STATION LTD, A HURLEY KNOWN JOINTLY AS "THE HUNTERVILLE HILL COUNTRY OBJECTORS"	422	10	The Council needs to reduce significantly the number of instances where WFBP's or Resource Consents are needed. Council also needs to resist the temptation of seeing WFBP's as a solution. Council needs to find ways to simplify the effects and implications of the Plan and to find ways to incentives its implementation at the lowest possible, sustainable cost	Reject
C R GRACE, M HURLEY, HINAU STATION LTD, DUNCAN LAND CO LTD, TE KUMU ESTATES LTD, OTAIRI STATION LTD, A HURLEY KNOWN JOINTLY AS "THE HUNTERVILLE HILL COUNTRY OBJECTORS"	422	11	Horizons must find a way to ensure that only risky major works require the expense of a Resource Consent application or the production of a WFBP	Reject
C R GRACE, M HURLEY, HINAU STATION LTD, DUNCAN LAND CO LTD, TE KUMU ESTATES LTD, OTAIRI STATION LTD, A HURLEY KNOWN JOINTLY AS "THE HUNTERVILLE HILL COUNTRY OBJECTORS"	422	7	In our submission, the Council needs to give serious consideration to mitigating the effects of reduced income and depopulation. If the Council does not do so, the sustainability of the programme will seriously be at risk and no-one will benefit.	Reject
C R GRACE, M HURLEY, HINAU STATION LTD, DUNCAN LAND CO LTD, TE KUMU ESTATES LTD, OTAIRI STATION LTD, A HURLEY KNOWN JOINTLY AS "THE HUNTERVILLE HILL COUNTRY OBJECTORS"	422	8	We submit that there needs to be more clearly stated policies with regard to the incentives for voluntary retirement of at risk land.	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	35	Amend 5.5 as follows:	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			Targets "50% of properties with Highly Erodible Land will have an operative whole farm business plan or have implemented methods to effectively reduce accelerated erosion by 2017."	

4.14.1 Summarise submission points

- (a) Monitoring of SLUI is required.
- (b) Include 'Department of Conservation' to the list of parties involved in SLUI.
- (c) Establish an accreditation system for WFBPs.
- (d) Costs of compliance/implementation of WFBPs are considered to be too high.
- (e) Improve mapping resource.
- (f) Amend definition of WFBP.
- (g) Promote active management.
- (h) Include links to policies in the POP.
- (i) Include detailed methodologies for methods in the POP – not just summaries.
- (j) General support for provision.

4.14.2 Technical Assessment

The evidence of Jon Roygard includes an explanation of the monitoring that is proposed as part of the SLUI programme. While I will not repeat what is stated in the evidence, I agree with the evidence of Jon Roygard that there is a monitoring programme in place as part of the SLUI framework. I do not consider any modification to this method is necessary to recognise this.

4.14.3 Evaluation

The request to include the 'Department of Conservation' to the list of parties involved in SLUI is not considered necessary. The list already includes 'government departments and ministries'. While the Department of Conservation is a significant land owner in the area, I consider it is not necessary to specify every party involved in the programme.

The monitoring of WFBPs is discussed in the evidence of Jon Roygard and Allan Kirk. This evidence explains the level of expertise required of the consultants involved with the development and the accreditation system for WFBPs. I consider that the current SLUI programme provides a robust approach to developing and monitoring WFBPs and that a separate accreditation system is not necessary.

As is explained in the evidence of Alec McKay and Greg Carlyon, the costs associated with the SLUI project have been carefully considered and evaluated. The costs are considered appropriate in response to the anticipated benefits. Based on the evidence provided, I do not consider that the costs of compliance/implementation of WFBPs are too high.

Improvement of mapping resources provided by Horizons and as part of the SLUI programme falls outside the scope of the POP. However in the evidence of Jon Roygard, there is a summary of the current programme to update the Land Use Classification methodology to make it more applicable to the farm scale.

Amendment of the definition of WFBP has been discussed previously in this report. I consider that the SLUI programme as currently set up, including the WFBP template, is focussed on farming. Modifications to incorporate other land use activities are possible in the future, however they have not yet been integrated. Therefore, I do not consider it appropriate to amend the definition of WFBP in the POP without the corresponding modification to the process outside of the POP.

I note that the SLUI and WFBP approach is a method for the promotion and implementation of active management. Alec McKay will discuss this concept in his evidence. I do not consider that the method requires any modification as active management is inherent in the SLUI programme.

Including links to the relevant policies in the Land chapter is considered appropriate. I agree that the method should list links to Policies 5-1, 5-2 and 5-3. There is no specific reference to SLUI or WFBPs in policies 5-4 and 5-5 and it is not therefore necessary to document a link.

The methods listed in the POP are summaries. To include detailed methodologies would unnecessarily clutter the POP and would also result in any minor changes to the way in which those methods are undertaken requiring a plan change (to change the methodology in the POP). I therefore do not consider that it is necessary or efficient to include more detail of the methods in the POP.

4.14.4 Recommendation

Reject submissions requesting that monitoring of SLUI is required.

Reject the submissions requesting addition of 'Department of Conservation' to the list of parties involved in SLUI.

Reject submissions seeking to establish an accreditation system for WFBPs.
 Reject submissions that state that the costs of compliance/implementation of WFBPs are considered to be too high.
 Reject submission requesting improvement of the mapping resource.
 Reject submissions requesting amendment to the definition of WFBP.
 Accept in part submissions promoting active management.
 Accept in part submissions to include links to policies in the POP.
 Reject submissions requesting to include detailed methodologies for methods in the POP – not just summaries.
 Accept submissions expressing general support for provision.

4.14.4.1 Recommended changes to provision

Add 'Policy 5-2 and Policy 5-3' to the 'Links to Policy' row.

4.15 Recommendation Land 15 Chapter 5 Method Wanganui Catchment Strategy

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
MICHAEL STANWICK	44	1	In the above context of the Environment report and with reference to the One Plan and the problem of extensive soil erosion in the Wanganui hill country, I propose extensive replanting of locally sourced, native forest species, suitably fenced, where erosion threats are imminent or occurring in those areas where commercial forestry is not a viable option. If this replanting is considered as a serious measure against erosion threats and a serious tool in erosion management, I propose the preservation of the resultant native stands of forest be considered in perpetuity.	Accept in part
MICHAEL STANWICK	44	2	I further propose that the preservation concept be ring-fenced, also in perpetuity, from the harvesting of any resultant native forest stands (from soil erosion replanting) and rating relief be apportioned on a paddock by paddock basis where farmers are encouraged to set aside land for the above purposes.	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
WANGANUI DISTRICT COUNCIL	291	92	Identification of the part WDC will play in the development of this strategy, and the potential cost to farmers in the Wanganui District.	Reject
	X 481	552	PALMERSTON NORTH CITY COUNCIL - Support	Reject
MINISTER OF CONSERVATION	372	25	Add 'Department of Conservation' to list of parties included in the 'Whanganui Catchment strategy' project.	Accept in part
MINISTRY OF AGRICULTURE & FORESTRY	373	53	Retain Method in Section 5.5.	Accept
TARANAKI FISH & GAME COUNCIL	406	16	Retain this section	Accept
FEDERATED FARMERS OF NEW ZEALAND INC	426	37	Amend 5.5 as follows "50% of properties within the Wanganui Catchment with Highly Erodible Land will have an operative whole farm business plan or have implemented methods to effectively reduce accelerated erosion in place by 2017."	Reject

4.15.1 Summarise submission points

- (a) Include 'Department of Conservation' to the list of parties involved in SLUI.
- (b) Wanganui District Council seeks to understand what role it will play in the programme.
- (c) Protection of vegetation, revegetation with native species and rates relief for land set aside (44/2)
- (d) General support.

4.15.2 Evaluation

As the Department of Conservation is a significantly interested party in this particular catchment, I agree that it is appropriate to add 'Department of Conservation' to the list of parties involved in the SLUI programme for this catchment.

The role that Wanganui District Council plays in the programme has been developed through consultation and discussion as part of implementing the project. This is an on-going matter that is more appropriately dealt with through discussions between the SLUI team and Wanganui District Council officers.

The precise manner in which each WFBP is developed and applied in each situation will be different. Where the protection and planting of native species is considered to be a favourable option by the landowner and achieves the desired outcomes, it is likely that such activity will be supported. However it is not considered appropriate for the POP to specify the vegetation type and the way in which WFBPs are implemented on individual farms. Therefore, I do not consider any change to the method necessary in response to submission 44/2/3.

4.15.3 Recommendation

Accept the submission requesting to include 'Department of Conservation' to the list of parties involved in SLUI.

Reject the submission requesting Wanganui District Council seeks to understand what role it will play in the programme.

Reject the submission requesting protection of vegetation, revegetation with native species and rates relief for land set aside (44/2)

Accept submissions expressing general support.

4.15.3.1 Recommended changes to provision

Add 'Department of Conservation' to the 'Who' row.

4.16 Recommendation Land 16 Chapter 5 Method Education in Schools Land

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
SUSTAINABLE WHANGANUI	176	7	The Youth Environment Forum should be included in Education in Schools and should be acknowledged in the One Plan.	Accept in part
MINISTRY OF AGRICULTURE & FORESTRY	373	48	Retain Method in Section 5.5.	Accept
TARANAKI FISH & GAME COUNCIL	406	12	Retain this section	Accept
DIANA BAIRD	443	14	Therefore, my submission is that Horizons abandon the "Green-rig" project.	Reject
MIDDLE DISTRICTS FARM FORESTRY ASSOCIATION	444	1	We strongly urge HRC to extend this programme to general media programmes, field days, discussion groups, etc. Older age groups need education in this area just as much as school children and rules are no substitute for a lack of understanding of soil and water processes.	Reject
	X 501	265	ERNSLAW ONE LTD - Support	Reject
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	26	Good initiative	Accept
	X 506	11	MANAWATU BRANCH OF N Z GREEN PARTY - Support	Accept

4.16.1 Summarise submission points

- (a) Make specific reference to the Youth Environment Forum in the POP.
- (b) Abandon the Green Rig project.
- (c) Extend education programme beyond schools.
- (d) General support

4.16.2 Evaluation

Making reference to youth organisations with interests or connections with the environment is considered to be supportive and consistent with this method. To avoid limiting the list to specific organisations, I recommend including reference to 'youth organisations and forums'.

The request to abandon the Green Rig project is outside the scope of the POP and therefore is not considered in this report.

This method is focussed on educating youth as it is recognised that they are the next generation of land users and managers. It is also recognised that education of youth often has a flow-on influence on the parents of those people. Specifically identifying youth as an education target does not mean that Horizons will not continue to educate and promote sustainable management to other sectors of the community through its various programmes. While I agree with the intent of the submission I do not consider it appropriate to include a reference to other education initiatives within this method.

4.16.3. Recommendation

Accept in part submission requesting specific reference to the Youth Environment Forum in the POP.

Reject submissions requesting that Horizons abandon the Green Rig project.

Reject submission seeking to extend education programme beyond schools.

Accept submissions expressing general support.

4.16.3.1 Recommended changes to provision

Add 'youth organisations and forums' to the 'Who' row.

4.17 Recommendation Land 17 Chapter 5 Sustainable Land Use Initiative Soil Health

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
SHARN HAINSWORTH	116	22	I submit that it is also important to continue to develop a culture of farmers working as communities to resolve issues in their area. The Sustainable Land Management Groups model can also be helpful in kick-starting this role.	Accept in part
HAINSWORTH - KELFER PARTNERSHIP	139	1	Horizons provide a list of farm plan providers and Farm Advisors. Horizons work alongside Farmers, providing a list of farm plan providers and Farm Advisors. The Advisors are to encourage the implementation of strategies that conserve our natural heritage as outlined in the One Plan.	Accept in part
HAINSWORTH - KELFER PARTNERSHIP	139	2	Farmers will not have to disclose financial information to complete a farm plan. Farmers will not be expected to disclose their financial information, however written consent will be given by the Farmer to their Accountant to inform the Farm Advisor if farmers are able to afford to retire land, if land retirement is required.	Accept in part
WATER AND ENVIRONMENTAL CARE ASSN INC	311	17	Targets INSERT - All current and future intensive pig farming operations	Reject
MANAWATU ESTUARY TRUST	312	9	Targets INSERT - All current and future intensive pig farming operations	Reject
GEORGE & CHRISTINA PATON	313	9	Targets INSERT - All current and future intensive pig farming operations	Reject
HORTICULTURE NEW ZEALAND	357	53	Decision Sought: Delete the project "Sustainable Land Use Initiative - Soil Health" or amend the reference to VegFed to Horticulture NZ.	Accept in part
MINISTRY OF AGRICULTURE &	373	51	Retain Method in Section 5.5.	Accept

Submitter	Number	Point	Decision Sought	Recommendation
FORESTRY				
JAMES BULL HOLDINGS LIMITED	400	3	The Horizons Plan as proposed includes reference to Land Policy, Section 5.5 under "Soil Health initiative", deciding who will be major cropper/horticulturist and major contractors who will be required to operate under undisclosed regimes by certain dates. This proposal is repugnant bureaucracy. I can offer a quite different approach using current practice and common sense.	Reject
	X 531	52	HORTICULTURE NEW ZEALAND - Support in Part	Reject
TARANAKI FISH & GAME COUNCIL	406	15	Retain this section	Accept
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	22	No decision requested, however submitter notes: "support the project"	Accept
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	23	Support in part would want to see non-industry stakeholders involved in the development of programme of action	Accept in part
TE IWĪ O NGATI TUKOREHE TRUST	461	4	The Trust would like to see more effort by the One Plan into actively creating natural and cultural landscape buffer zones for the Horowhenua south west coast by preventing peri-urban subdivision on coastal fore dunes, as proposed at Waikawa, Hokio, Waitarere, Foxton and further north	Reject

4.17.1 Summarise submission points

- (a) Amend reference from 'VegFed' to 'Horticulture New Zealand'
- (b) Include reference to all current and future intensive pig farming operations.
- (c) Disclosure of financial information.
- (d) Management of peri-urban subdivision
- (e) General support.
- (f) General opposition.

4.17.2 Evaluation

I agree with the request to amend the reference in the table from ‘VegFed’ to ‘Horticulture New Zealand’ in order to make reference to the appropriate industry organisation.

Intensive pig farming operations tend to be undertaken within buildings, in which case there is little risk to soil health. The discharge of animal effluent, while related to soil health, is a matter more appropriately addressed through the provisions in the POP related to discharges to land and water. While intensive pig farming operations may be incorporated in this method, I do not consider it necessary to amend the method to make specific mention of them.

The method refers to education and promotion of sustainable land use practices. There is no requirement for disclosure of financial information.

Management of peri-urban subdivision is predominantly a territorial authority matter as they have the ability under the Act to control subdivision and the land use associated with it. While it may be a consideration in terms of soil health, it is not a significant land use intended to be targeted by this method. I therefore do not consider it appropriate to include reference to it.

Submitters expressing general opposition offer no alternative relief or raise matters that not obviously relevant to this particular method.

4.17.3 Recommendation

Accept submission requesting to amend reference from ‘VegFed’ to ‘Horticulture New Zealand’

Reject submissions requesting to include reference to all current and future intensive pig farming operations.

Reject submissions referring to disclosure of financial information.

Reject submissions requesting management of peri-urban subdivision

Accept submission expressing general support.

Reject submissions expressing general opposition.

4.17.3.1 Recommended changes to provision

Change ‘VegFed’ to ‘Horticulture New Zealand’ in the ‘Who’ row.

4.18 Recommendation Land 18 Chapter 5 Method Land Research, Monitoring and Reporting Programme

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
ON TRACK (N Z RAILWAYS CORPORATION)	161	9	ONTRACK would like to be involved in this project.	Accept in part
MINISTRY OF AGRICULTURE & FORESTRY	373	49	Retain Method in Section 5.5.	Accept
TARANAKI FISH & GAME COUNCIL	406	13	Retain this section	Accept
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	25	Support	Accept
	X 506	10	MANAWATU BRANCH OF N Z GREEN PARTY - Support	Accept

4.18.1 Summarise submission points

(a) General support

4.18.2 Recommendation

Accept submissions expressing general support.

4.18.2.1 Recommended changes to provision

None.

4.19 Recommendation Land 19 Chapter 5 Method Infrastructure Protection

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
ON TRACK (N Z RAILWAYS CORPORATION)	161	10	ONTRACK would like to be involved in this project.	Accept in part
GENESIS POWER LTD	268	22	Retain Method 5-5 Infrastructure Protection.	Accept
	X 511	144	TRUST POWER LIMITED - Support	Accept
POWERCO LIMITED	272	16	K1 - The range of participants be expanded to explicitly include electricity and gas distribution owners.	Accept in part
POWERCO LIMITED	272	17	K2 - Recognition that there is link to Policy 5-3.	Accept
WATER AND ENVIRONMENTAL CARE ASSN INC	311	18	Project Description INSERT Review the continuation of paper roads in the dune systems that currently have permitted use for recreational purposes. REASON Off-road vehicle recreation is clearly evidenced as being wreckreation.	Reject
MANAWATU ESTUARY TRUST	312	10	Project Description INSERT Review the continuation of paper roads in the dune systems that currently have permitted use for recreational purposes. REASON Off-road vehicle recreation is clearly evidenced as being wreckreation.	Reject
	X 500	206	TARARUA DISTRICT COUNCIL - Oppose	Accept
	X 507	206	MANAWATU DISTRICT COUNCIL - Oppose	Accept
	X 515	206	HOROWHENUA DISTRICT COUNCIL - Oppose	Accept
	X 517	115	RANGITIKEI DISTRICT COUNCIL - Oppose	Accept
	X 532	206	WANGANUI DISTRICT COUNCIL - Oppose	Accept
GEORGE & CHRISTINA PATON	313	10	Project Description INSERT Review the continuation of paper roads in the dune systems that currently have permitted use for recreational purposes. REASON Off-road vehicle recreation is clearly evidenced as being wreckreation.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
TRANSIT NEW ZEALAND	336	19	Amend the second sentence under this method to read: 'Infrastructure, such as roading can in some instances be a contributor to erosion __.' Transit is happy to be identified as an agency which would work with Council on this project.	Accept in part
TRUST POWER LIMITED	358	26	Amend Method 5.5: Infrastructure Protection Project to include reference to renewable energy development. Any similar amendments to like effect. Any consequential amendments that stem from the amendment of Method 5.5 and/or Section 5.7 as proposed in this submission.	Reject
	X 525	237	GENESIS POWER LTD - Support	Reject
MIGHTY RIVER POWER	359	41	Retain Infrastructure Protection method	Accept
	X 511	145	TRUST POWER LIMITED - Support	Accept
MINISTRY OF AGRICULTURE & FORESTRY	373	47	Retain Method in Section 5.5.	Accept
TARANAKI FISH & GAME COUNCIL	406	11	Retain this section	Accept

4.19.1 Summarise submission points

- (a) Explicitly include particular network owners or type of infrastructure.
- (b) Include reference to Policy 5-3.
- (c) Review paper roads to control off-road vehicle use.
- (d) Amend reference to infrastructure always being a contributor to erosion.
- (e) General support.

4.19.2 Evaluation

The method provides general reference to infrastructure and network owners, so I do not consider that there is a need to explicitly include particular network owners or type of infrastructure. I do not consider that this would add any clarity to the reading or understanding of the method.

I agree with the recommendation to include reference to Policy 5-3. Policy 5-3 makes specific reference to infrastructure.

The management of paper roads to control off-road vehicle use is a matter more appropriately addressed by territorial authorities.

I consider an amendment to the current wording, which suggests that infrastructure is always a contributor to erosion is necessary to clarify the statement. Amending the wording to 'can in some instances be a contributor to erosion' is considered to be a more accurate statement.

4.19.3 Recommendation

Reject submissions that request to explicitly include particular network owners or type of infrastructure.

Accept submissions that request to include reference to Policy 5-3.

Reject submissions that seek a review paper roads to control off-road vehicle use.

Accept submissions requesting to amend reference to infrastructure always being a contributor to erosion.

Accept submissions that express general support.

4.19.3.1 Recommended changes to provision

Replace 'is a major contributor to erosion' in the second sentence of the first paragraph with 'can in some instances be a contributor to erosion'.

Add 'Policy 5-3' to the 'Links to Policy' row.

4.20 Recommendation Land 20 Chapter 5 Method Sustainable Land Use Codes of Practice and Best Management Practices

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
ON TRACK (N Z RAILWAYS CORPORATION)	161	8	ONTRACK would like to be involved in this project.	Accept in part
NEW ZEALAND DEFENCE FORCE	330	31	Retain the Method as is in the Proposed One Plan	Accept
MINISTRY OF AGRICULTURE & FORESTRY	373	21	Enable the use of codes of practice and other sector-based initiatives for sustainable land use, construction, production and operating methods as part of a catchment focused FARM Strategy.	Accept in part
MINISTRY OF AGRICULTURE & FORESTRY	373	50	Retain Method in Section 5.5.	Accept
TARANAKI FISH & GAME COUNCIL	406	14	Retain this section	Accept
FEDERATED FARMERS OF NEW ZEALAND INC	426	38	Amend Target 3 to state "90% of pastured based farms are managed in accordance with agreed sector-based best management practice by 2017". (or words to this effect)	Reject
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	24	Support in part would want to see non-industry stakeholders involved in the development of codes of best practice.	Accept in part
	X 506	5	MANAWATU BRANCH OF N Z GREEN PARTY - Support	Accept in part

4.20.1 Summarise submission points

- (a) Amend Targets to specify a percentage of farms managed in accordance with agreed BMPs.

(b) General support.

4.20.2 Evaluation

The method supports voluntary engagement by sector groups and individuals. The method also relies upon sector groups developing and promoting best management practices and codes of practice. Due to the level of uncertainty, specifying a precise level of achievement is not considered appropriate as the ability to meet the target is outside the control of Horizons.

4.20.3 Recommendation

Reject submissions requesting specific percentage achievement targets are added to the method.
Accept submissions that provide general support.

4.20.3.1 Recommended changes to provision

None.

4.21 Recommendation Land 21 Chapter 5 Anticipated Environmental Results Table Row 1

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
WATER AND ENVIRONMENTAL CARE ASSN INC	311	19	INSERT Indicator Hard structures installed on a prograding coast	Reject
MANAWATU ESTUARY TRUST	312	11	INSERT Indicator Hard structures installed on a prograding coast	Reject
	X 500	208	TARARUA DISTRICT COUNCIL - Oppose	Accept
	X 507	208	MANAWATU DISTRICT COUNCIL - Oppose	Accept

Submitter	Number	Point	Decision Sought	Recommendation
	X 515	208	HOROWHENUA DISTRICT COUNCIL - Oppose	Accept
	X 532	208	WANGANUI DISTRICT COUNCIL - Oppose	Accept
GEORGE & CHRISTINA PATON	313	11	INSERT Indicator Hard structures installed on a prograding coast	Reject
TRANSIT NEW ZEALAND	336	20	That this Anticipated Environmental Result be retained in the plan.	Accept
MINISTER OF CONSERVATION	372	26	In first column add anticipated quantitative and measurable results to be achieved by 2012 and by 2017, in terms of the indicators set out in the third column and any other relevant outcome measures. These should include identification of a target date for meeting the relevant turbidity and clarity standards in Schedule D with 'minimum standards to be achieved by 2012 and 2017 for rivers which do not currently meet the standards.	Reject
	X 506	12	MANAWATU BRANCH OF N Z GREEN PARTY - Support	Reject
	X 511	143	TRUST POWER LIMITED - Support	Reject
	X 531	53	HORTICULTURE NEW ZEALAND - Oppose	Accept
ALFRED JAMES SIVYER	387	10	No specific decision requested, However submitter notes their opposition to this provision	Reject
TARANAKI FISH & GAME COUNCIL	406	17	Retain this section, but amend "net reduction" to "significant reduction" or something more specific that has the same meaning.	Reject
FISH & GAME NEW ZEALAND - WELLINGTON REGION	417	15	That the Anticipated Environmental Result be replaced to read: "The turbidity standards at half median for each water management zone, specified in Schedule D, Table D17, will be met"	Reject
DIANA BAIRD	443	15	Therefore, my submission is that Horizons restate these aims less emphatically, or with wider parameters.	Reject

4.21.1 Summarise submission points

- (a) Add reference to hard structures on prograding coasts.
- (b) Provide more specific targets for environmental results.

- (c) Provide less specific targets.
- (d) Amend 'net reduction' to 'significant reduction'
- (e) General support.

4.21.2 Evaluation

Submitters do not provide reasoning for including 'hard structures installed on prograding coasts' as an anticipated environmental outcome. Without further supporting evidence, I do not consider it necessary to add this as an additional indicator.

The current anticipated environmental result recognises that the current POP is a stepping-stone towards sustainable management of the land resource across the entire Region. The POP has a 10 year planning horizons and the Council, in consultation with the community, has proposed measures that are intended to be the first steps towards the sustainable management goal. It is therefore too early for precise measurements of environmental performance to be put in place. The Land chapter sets achievable targets for improving the land use practices of certain land types and industry sectors while regulating other land uses to avoid a worsening of environmental performance. All that can be asked in this initial stage is for there to be a recognisable improvement in key indicators to reflect the progress towards the longer-term goal. I consider that the current anticipated environmental results accurately reflect the environmental outcomes that are being sought for the POP.

The alternative, as suggested by some submitters, is to include a less specific anticipated environmental result. This would presumably include removing the target date and stating that key indicators would be no worse that at present. However this does not reflect the intent of the POP and the expectation that the measures to be implemented will result in a measurable improvement in the environment. I consider that this would be contrary to the direction the Council is taking to move forward from simply continuing to use the land resource in an unsustainable manner.

Amending the anticipated environmental result from seeking to achieve a 'net reduction' to achieving a significant 'significant reduction' would seem to add a higher level of achievement than currently proposed. A net reduction indicates a measurable change from the current situation, whereas a significant reduction indicates a substantial change. Horizons consider that the proposed measures in the POP are sufficient to bring about environmental improvement but at this stage not a significant improvement. As discussed above, significant improvements will be anticipated in the longer term.

4.21.3 Recommendation

Reject submissions that request to add reference to hard structures on prograding coasts.
Reject submissions that request to provide more specific targets for environmental results.

Reject submissions that request to provide less specific targets.
 Reject submissions requesting to amend 'net reduction' to 'significant reduction'.

4.21.3.1 Recommended changes to provision

None.

4.22 Recommendation Land 22 Chapter 5 Explanations and Principal Reasons

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
SUSTAINABLE WHANGANUI	176	8	We seek a policy which has a mix of carrots (incentives), sticks (regulations) and sermons (public education).	Accept in part
TRUST POWER LIMITED	358	27	Amend Section 5.7: Explanations and Principal Reasons to include reference to alternative low impact land uses such as windfarms or providing for renewable energy. Any similar amendments to like effect. Any consequential amendments that stem from the amendment of Section 5.7 as proposed in this submission.	Reject
	X 525	238	GENESIS POWER LTD - Support	Reject
ALFRED JAMES SIVYER	387	11	No specific decision requested, However submitter notes their opposition to this provision	Reject
ALISON MARGARET MILDON	401	59	Some acknowledgement could be made in 5-7 Explanations and Principal Reasons of the opportunity to avoid some causes of erosion altogether.	Accept in part
	X 527	376	TARARUA - AOKAUTERE GUARDIANS INC (T A G) - Support	Accept in part

4.22.1 Summarise submission points

- (a) Include reference to incentives, regulation and public education.
- (b) Include reference to alternative low impact land uses such as windfarms.
- (c) Include acknowledgement of the opportunity to avoid some causes of erosion altogether.
- (d) General objection.

4.22.2 Evaluation

The use of incentives, regulation and education is embodied in the objectives, policies, rules and methods related to the Land chapter. These components of the POP are not an explanation for the provisions (so do not need to be included in the Explanation section), nor principal reasons for the provisions (so do not need to be included in the Principal Reasons section), therefore I do not consider it necessary to identify them in this section of the POP. For similar reasons, making mention of specific activities (such as windfarms) is not appropriate in this section.

The wording of point 1 in 5.7 includes reference to employing different stocking rates, introducing forestry or retiring land, all of which are opportunities to avoid some causes of erosion altogether. I consider the section already makes it clear that 'active participation' is part of the reason for including the various measures in the POP to manage land use.

4.22.3 Recommendation

Reject submissions that request inclusion of reference to incentives, regulation and public education.
Reject submissions requesting to include reference to alternative low impact land uses such as windfarms.
Accept in part submissions requesting acknowledgement of the opportunity to avoid some causes of erosion altogether.
Reject submissions that express general objection.

4.22.3.1 Recommended changes to provision

None.

Chapter 12 – Land Use Activities and Land-Based Biodiversity

In this section of my report I will address submissions raised in relation to the policies and rules in Chapter 12 that relate to vegetation clearance and land disturbance. The provisions that relate to at-risk habitats and rare and threatened habitats will be addressed in the Planning Report associated with Chapter 7 – Living Heritage.

4.23 Recommendation Land 23 Chapter 12 General General

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
PETER LEFEAUX NEVINS	29	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	205	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
LYNDA JEAN BAINES	40	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	210	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
GLENDA LUSCOMBE	41	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	211	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
HELEN CLAIRE MCKENZIE	42	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			Resource Management Act and the Local Government Act 2002.	
	X 502	212	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
IC HY THUS CONSULTING	59	4	That Net Water Balance (NWB) criteria will be given consideration in rules and consenting criteria/conditions.	Reject
ALAN GEORGE & CATHERINE SUSAN DONALDSON	62	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with affected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	213	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
	X 509	2	WANGANUI BRANCH OF THE NATIONAL COUNCIL OF WOMEN OF NEW ZEALAND – Oppose	Accept
BARBARA ANNE TAYLOR	66	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	214	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
SALLY JANE & KEITH THOMAS SHERSON	67	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	215	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
PETERSEN FAMILY TRUST	68	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	216	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
KERRY BLACKBURN	69	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			Resource Management Act and the Local Government Act 2002.	
	X 502	217	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
PETER & MAXENE HOWIE	70	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	218	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
JUDY JOHANSEN	71	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	219	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
PETER DOUGLAS HAWKINS	72	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	220	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
BRIGETTE NEESON	73	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	221	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
ELAINE COUPER	74	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	222	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
MIRIAM JANE TARRANT	75	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	
	X 502	223	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
RODNEY BREARS	76	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	224	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
AJIT SINGH BELLING	78	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	225	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
LYALL WALKER	79	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	226	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
SUSAN CONRAD	80	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	227	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
EDWARD NELSON TARRANT	81	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	228	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
SHERYL YVONNE	82	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules	Reject

Submitter	Number	Point	Decision Sought	Recommendation
FRASER			after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	
	X 502	229	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
GENEE LEONIE LUDLAM	83	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	230	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
AMY COUPER	84	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	231	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
LANCE & MANNIX HOUPAPA	85	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	232	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
GEOFF & JOSE HEALE	86	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	233	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
ANNIE CARMICHAEL	87	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	234	NEW ZEALAND DEFENCE FORCE - Oppose	Accept

Submitter	Number	Point	Decision Sought	Recommendation
GRAHAM CARMICHAEL	88	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	235	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
EVELYN HEALE	90	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	236	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
MERLE HEMOPO	91	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	237	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
SEAN ROBERT TRAFFORD & ALEXANDRA ROGERS	92	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	238	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
KEN MARSHALL	95	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	239	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
PETER & GAIL GOWER	119	2	Removal of Chapter 12 (Twelve) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with affected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	179	NEW ZEALAND DEFENCE FORCE - Oppose	Accept

Submitter	Number	Point	Decision Sought	Recommendation
GARRY BURGESS DICKIE	120	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	180	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
G S HALL	128	2	Removal of Chapter 12 of the Plan and introduce relevant policies and rules after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 502	181	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
S GALL	129	2	Removal of Chapter 12 of the Plan and introduce relevant policies and rules after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 502	182	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
N COLLIER	130	2	Removal of Chapter 12 of the Plan and introduce relevant policies and rules after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 502	183	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
ROSS CHARLES & JUSTINE FRANCES WALKER	131	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	184	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
KURUA FARMS	132	2	Removal of Chapter 12 (TWELVE) of the Plan as I believe this to be much to general and needs much consultation we must be able to continue	Reject

Submitter	Number	Point	Decision Sought	Recommendation
CLIFTON HOWARD TOMBLESON	133	2	development for the benefit of the region. Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	185	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
PAUL ALEXANDER MC GLADE & EUNICE ROBIN WEIR	134	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with affected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	186	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
R T WALLER	135	2	Removal of Chapter 12 of the Plan and introduce relevant policies and rules after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 502	187	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
N C TYLEE	136	2	Removal of Chapter 12 of the Plan and introduce relevant policies and rules after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 502	188	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
GEORGE ALEXANDER HOPEFAL GOWER	138	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant and rules after sufficient evaluation and consultation with effected parties.	Reject
	X 502	189	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
HAINSWORTH - KELFER PARTNERSHIP	139	5	An arbitration facility be available to Farmers, free, to resolve disputes between Horizons and Farmers in regards to farm plans.	Reject
			The inclusion of an arbitration facility to resolve disputes between Horizons	

Submitter	Number	Point	Decision Sought	Recommendation
GORDON ROBERT GOWER	146	2	and Farmers to resolve issues pertaining to the One Plan, which is free to Farmers. Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with affected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	191	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
IVAN BRENT & ROSEMARY LYNETTE WATTS	150	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	190	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
RUAPEHU DISTRICT COUNCIL	151	132	[Reference to Rules 12-2, 12-3, 12-7 and 12-8] That 'slope' is a blunt measure for highly erodible land, and more scientific methods must be used, including soil type, etc.	Accept in part
	X 481	197	PALMERSTON NORTH CITY COUNCIL - Support	Accept
	X 501	4	ERNSLAW ONE LTD - Support	Accept
RUAPEHU DISTRICT COUNCIL	151	141	[Reference to Rules 12-1, 12-3, 12-4, 12-5, 12-6] Maintenance of the infrastructure including district road network and the carrying out of upgrade works be a permitted activity.	Accept in part
	X 481	206	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
RUAPEHU DISTRICT COUNCIL	151	144	(c) Add a new rule providing for the normal maintenance and minor improvements of infrastructure including the roading network under the control of the Road Controlling Authority as a permitted activity.	Accept in part
	X 481	209	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 498	24	TRANSIT NEW ZEALAND - Support	Accept in part
VELMA JUNE SIEMONEK	167	2	No specific decision requested for chapter 12. (Removal of chapter 5 was suggested in submission point 167/1)	Reject
KARL SPLITT	169	2	Removal of Chapter 12 of the Plan and introduce relevant policies and rules	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	
	X 502	192	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
KEVIN JOHN SIEMONEK	170	2	Removal of Chapter 12 of the Plan and introduce relevant policies and rules after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 502	193	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
P JOHN CHURMAN	171	2	Removal of Chapter 12 of the Plan and introduce relevant policies and rules after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 502	194	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
TARARUA DISTRICT COUNCIL	172	71	Add a new rule providing for the normal maintenance and minor improvements of the roading network under the control of the road controlling authority as a permitted activity.	Accept in part
	X 481	342	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 498	21	TRANSIT NEW ZEALAND - Support	Accept in part
NGATI KAHUNGUNU IWI INCORPORATED	180	59	Change all headings in the last column to:- "Control /discretion and Notification requirements"	Reject
	X 501	10	ERNSLAW ONE LTD - Oppose	Accept
LUKE CHRISTOPHER GREEN	183	2	Removal of Chapter 12 of the Plan and introduce relevant policies and rules after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 502	195	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
DEAN SADDLER GOWER	184	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	196	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
HELEN MARGARET IRWIN LILEY	191	2	Removal of Chapter 12 and provide a much more accurate evaluation and consultation of the local economy. It is clearly apparent to those of us who live here that we can attend to environmental protection and by continuing to exist, provide a very useful safety valve for other farming areas prone to ravages such as drought.	Reject
RON & SANDRA CAREY	193	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	197	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
NEVILLE FRANCIS WHEELER	194	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	198	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
SPLIT ROCK STATION LTD	199	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	199	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
NEIL & ANNIE PETERSEN	210	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 502	200	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
TREVOR OWEN COUPER	212	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	201	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
TANIA FAYE BOLTON	216	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	202	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
ROBERT GEORGE & COLLEEN MARY DONALDSON	219	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	203	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
TREVOR ALLEN JOHNSON	233	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant objectives and rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legal requirement under the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	204	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
SCOTT GOWER	254	4	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	240	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
MATT BELL	256	3	Redraft Chapter 12 so there is a realistic balance between environmental gains and economic costs with regards to hill country farming.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
MATT BELL	256	4	Set a policy that allows hill country farmers to hold existing use rights as to how they currently farm and manage their land, with the voluntary option of implementing a Farm Plan.	Accept in part
TRANSPower NEW ZEALAND LTD	265	17	F. Ensure that all the resource maps are included (or at least available eg. via website) at a scale that clearly identifies their extent on a property by property basis.	
	X 492	191	MINISTER OF CONSERVATION - Support	Accept in part
	X 501	20	ERNSLAW ONE LTD - Support	Accept in part
	X 528	16	POWERCO LIMITED - Support	Accept in part
TRANSPower NEW ZEALAND LTD	265	18	G. Include a clear acceptable and practicable methodology for specifying how slope angle will be calculated for the purposes of establishing activity status.	Accept in part
	X 501	21	ERNSLAW ONE LTD - Support	Accept in part
	X 522	100	MERIDIAN ENERGY LIMITED - Oppose	Reject
	X 528	17	POWERCO LIMITED - Support	Accept in part
TRANSPower NEW ZEALAND LTD	265	8	Ensure that the vegetation trimming and land disturbance activities necessary for operating, maintaining replacing and upgrading the integrity of the National Grid are either permitted or not regulated. This can be achieved by the following decisions requested:	Accept in part
POWERCO LIMITED	272	32	R1 - Powerco supports the overall approach being pursued by the Council but will work to ensure that the essential works (including vegetation clearance and some land disturbance) which need to take place in order to ensure the efficient operation of network utilities are not unduly inhibited. Powerco reserves its position in relation to Chapter 12 pending the Council s consideration of the Glossary definitions.	Accept in part
HOROWHENUA DISTRICT COUNCIL	280	74	Add a new rule providing for the normal maintenance and minor improvements of the roading network under the control of the road controlling authority as a permitted activity.	Accept in part
	X 481	435	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 498	22	TRANSIT NEW ZEALAND - Support	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
WANGANUI DISTRICT COUNCIL	291	91	Add a new rule providing for the normal maintenance and minor improvements of the roading network under the control of the road controlling authority as a permitted activity.	Accept in part
	X 481	551	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
KAWAUTAHI FARMS LTD	321	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject
	X 502	206	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
J N TURNER	322	2	Removal of Chapter 12 of the Plan and introduce relevant policies and rules after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 502	207	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
G P & C S DEMPSEY	324	2	Removal of Chapter 12 of the Plan and introduce relevant policies and rules after such time as the MWRC has carried out sufficient evaluation and consultation with affected parties as it is legally required to in the terms of the RMA Section 32 & 35 and the Local Government Act 2002 Sections 3, 82 and 78.	Reject
	X 502	208	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
MANAWATU DISTRICT COUNCIL	340	93	Add a new rule providing for the normal maintenance and minor improvements of the roading network under the control of the road controlling authority as a permitted activity.	Accept in part
	X 481	649	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 498	23	TRANSIT NEW ZEALAND - Support	Accept in part
DIGBY MILNE BRICE	345	2	Removal of Chapter 12 (TWELVE) of the Plan and introduce relevant rules after such time as MWRC (Horizons) has carried out sufficient evaluation and consultation with effected parties. This is legally required in the terms of the Resource Management Act and the Local Government Act 2002.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 502	209	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
ENVIRONMENTAL WORKING PARTY	386	90	We generally endorse the Councils approach for dealing with land use activities and land based biodiversity. However, we have ..[some] comments and suggestions.	Accept in part
ENVIRONMENTAL WORKING PARTY	386	91	We ask that Council insert a new policy and/or objective within Chapter 12 to provide a cross reference to Chapter 4 (Te Ao Maori). The policies and objectives of Chapter 4 are important to, and interlinked with, policies and objectives throughout the rest of the Plan. We encourage this approach so that Maori issues and perspectives on environmental management are not isolated to Chapter 4, but made relevant and meaningful through all aspects of the One Plan.	Reject
ARBOR MANAGEMENT LIMITED	391	6	it is important that the Council develops rules that create a permissive regime for sustainably and responsibly managed plantation forestry activities.	Accept in part
	X 501	217	ERNSLAW ONE LTD - Support	Accept in part
	X 520	105	N Z FOREST MANAGERS LTD - Support	Accept in part
TARANAKI FISH & GAME COUNCIL	406	70	Retain this section.	Accept
	X 492	192	MINISTER OF CONSERVATION - Support	Accept
	X 495	217	RUAPEHU DISTRICT COUNCIL - Oppose	Reject
CUTTRISS CONSULTANTS	413	1	No specific decision requested, however submitter notes: We support the inclusion of the COASTAL HIGHLY ERODIBLE LAND which falls across the entire western coastline	Accept
CUTTRISS CONSULTANTS	413	2	We would ask, however that the maps showing the parcels of land identified as 'Highly Erodible' and 'Significant Landscapes' be made available to the public as soon as possible on the Horizons website.	Accept in part
NGA PAE O RANGITIKEI	427	90	We generally endorse the Councils approach for dealing with land use activities and land based biodiversity. However, we have ..[some] comments and suggestions.	Accept in part
NGA PAE O RANGITIKEI	427	91	We ask that Council insert a new policy and/or objective within Chapter 12 to	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
			provide a cross reference to Chapter 4 (Te Ao Maori). The policies and objectives of Chapter 4 are important to, and interlinked with, policies and objectives throughout the rest of the Plan. We encourage this approach so that Maori issues and perspectives on environmental management are not isolated to Chapter 4, but made relevant and meaningful through all aspects of the One Plan.	
	X 527	413	TARARUA - AOKAUTERE GUARDIANS INC (T A G) - Support	Accept in part
KIRSTEN ANN BRYANT	429	2	I request the chapter 12 be withdrawn from the Proposed One Plan until such time that the science, practicality, sustainability and impact of the proposed policies and rules on the rural community be adequately evaluated and assessed. I request that horizons show how they intend to implement and fund the ideals and rules in chapter 12.	Reject
LOCAL FORESTRY INDUSTRY GROUP	435	11	We wish HRC to also consider with the same importance and effort in working with the forest industry to develop Whole of Forest Plans.	Accept in part
	X 501	255	ERNSLAW ONE LTD - Support	Accept in part
LANDLINK LTD	440	81	Specific references to sections in the Resource Management Act 1991 are unnecessary and will only make the Regional Plan inconsistent when legislation changes in the future.	Reject
NEW ZEALAND CONTRACTORS FEDERATION	458	3	NZCF requests that pre-approved members as contemplated by an accreditation scheme be authorised to work to more relaxed limits for the classes of activities they are pre-qualified for, than are presently contemplated in the proposed plan.	Reject
	X 501	292	ERNSLAW ONE LTD - Support	Reject
GEORGE MC NIE	466	2	Don't waste time making a whole lot of silly little rules that are never going to make any difference to much at all.	Reject
	X 493	1	GEORGE MC NIE - Unknown	Reject
BRUCE MACLEAN STEVENSON	472	1	Flood mitigation measures for Ohura Valley. -A WOF (warrent of fitness) scheme for farmers. -Animal welfare measures incorporated into the One Plan.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			-Aerial fertilizer and spray tax incorporated into the One Plan. -Measures enabling improvement of town water supply.	

4.23.1 Summarise submission points

- (a) Submitter 139/5 requests an arbitration facility to resolve any conflicts between Horizons staff and landowners in relation to developing WFBPs.
- (b) Submitter 386/91 and 427/91 request that specific cross-reference to the Te Ao Maori chapter is inserted within Chapter 5 Land to encourage consideration of the Te Ao Maori chapter throughout the POP.
- (c) Submitters request that the definition of HEL is amended and that the slope measurements for HEL are amended. This issue will be addressed in later sections of this report.
- (d) Submitter 180/59 requests that the last column in the table heading for the rules in the POP is changed from referring to 'non-notification' to 'notification requirements'.
- (e) A number of submitters have expressed general opposition to the Land chapter or to the provisions relevant to land use in Chapter 12. Included with these submissions are submissions of a general nature where the relief sought is unclear or unspecified (eg. 59/4, 440/81).
- (f) Several submitters request overall amendments to the Land chapter to enable infrastructure maintenance and minor upgrades to occur as permitted activities. This has predominantly been promoted by several of the territorial authorities in the Region, but has also been supported by Transpower New Zealand Ltd (265/8) and Powerco Limited (272/32). Trust power Limited (358/76) has requested that reference to Rare and Threatened and At Risk Habitats is deleted from the rules relating to land (this issue will be addressed in later sections of this report).
- (g) Submitters request opportunities for forestry activities to be undertaken as permitted activities in a similar way to farming activities can via WFBPs.
- (h) Several submitters provide general support for the provisions of the Land chapter (eg. 406/70, 417/68).
- (i) Approximately 66 submission points requested that Chapter 12 – Land Use Activities and Land Based Biodiversity be removed and that alternative rules are introduced once sufficient evaluation and consultation with affected parties has been undertaken. The majority of these submission points are identical (via a pro forma submission) of which 84/2 and 88/2 are examples. These submissions points provide little in the way of further detail other than an objection to areas of the Region being identified as being Highly Erodible Land and allege that there is no scientific proof to back up this classification and that the result will be major social and economic implications for the region. The submissions do not expand upon the point and do not describe the social or economic effects envisaged.

4.23.2 Evaluation

In relation to arbitration over conflicts surrounding the development of WFBPs, I refer to the evidence of Allan Kirk in which he explains that the voluntary nature of WFBPs enables land owners or the Council to withdraw from the process at any time. While this is not a desirable outcome, it provides an opportunity for either party to step away from situations of conflict or disagreement but does not negate progress with the WFBP in the future. This mechanism avoids the need for a specific arbitration provision.

As discussed previously in this report, specific cross-references to the Te Ao Maori chapter are not considered necessary throughout the POP. There is an obligation for decision-makers to have regard to all relevant provisions of the POP when making decisions on resource consent applications, and conditions and standards are included on permitted and controlled activities to account for significant discoveries during land use activities. Management of water quality, air quality, land and the coast via other provisions of the POP have inherent links to the outcomes sought in the Te Ao Maori chapter. It is however appropriate to specifically refer to the Te Ao Maori chapter in Policy 12-1(i) where the direct relationships to other provisions within the POP are identified. This matter will be addressed in the section of this report which relates to policy 12-1.

As discussed previously, and in more detail in later sections of this report (in relation to Schedule A), it is recommended to include a written definition of HEL in place of the map in Schedule A. This change will address many of the submissions which seek clarification or changes to these provisions.

One submitter requests that the last heading in the rules table is changed from non-notification to notification. The intention of this column in the table is to provide guidance to decision-makers as to when it is likely to be appropriate to process a resource consent application on a non-notified basis. Therefore it would seem appropriate that title the column should continue to refer to 'non-notification'.

Amendments to the POP to enable forestry activities to take place using similar mechanisms to WFBPs or by using codes of practice is not currently considered appropriate because the methods (codes of practice, standards, etc) to enable this have not been sufficiently developed. The intention is for changes to be promoted to the POP, either via private plan change or by Horizons, to incorporate references and provisions that enable land use activities to occur as permitted activities provided they are operating under appropriately developed codes of practice.

Previous sections of this report (Policy 5-3, Glossary, Rule 12-3 and Rule 12-4) have touched on the need for vegetation clearance, and in some instances land disturbance, in order to maintain infrastructure. This is recognised as an appropriate activity to occur without resource consent as the extent of the works is likely to be small and the effects on accelerated erosion no more than minor. The section of my report relating to Policy 5-3 will address specific changes recommended to provisions in the POP.

Submitter that request that the chapter is withdrawn on the grounds that sufficient consultation or evaluation of costs and benefits has not occurred are referred to the Planning Report and evidence prepared for the hearing on the Overall One Plan. The evidence of Bettina Anderson clearly demonstrates the extensive consultation process undertaken in the formulation of the provisions of the POP. Members of the community were offered many opportunities to contribute to the development of the provisions of the POP, and many took up that opportunity. I consider that the submission process provides a further opportunity for people affected by provisions in the POP to express their concerns with those provisions, and I encourage submitters to expand on their concerns at the hearing.

Submitters that wish to amend provisions in the chapter will need to demonstrate what the particular failures of the provisions are and offer alternatives to the provisions that are more appropriate in achieving the objectives of the POP. The majority of the submissions do not appear to request any relief other than to withdraw the chapter and ‘introduce relevant rules’.

The evidence prepared in relation to this report demonstrates that a comprehensive consideration of technical reports and expert assessments has contributed to the development of the provisions of this and other chapters. Consideration of the costs of methods proposed in the POP, such as the WFBPs, has occurred and the provisions promoted by the Council are considered to be the most appropriate based on that knowledge and understanding. I do not consider that there is any evidence to support the withdrawal of Chapter 12, nor the introduction of alternative rules to those proposed.

4.23.3 Recommendation

Reject submissions requesting arbitration provisions be introduced into the POP.

Accept in part submissions requesting specific cross-references to the Te Ao Maori chapter of the POP.

Accept in part submissions requesting changes to the definition of HEL and to the map in Schedule A.

Accept in part submissions requesting changes to the provisions to allow for maintenance of infrastructure as a permitted activity.

Reject submissions seeking changes to the definition of WFBPs or the inclusions of unreviewed codes of practice for forestry.

Reject submissions requesting Chapter 12 be withdrawn and alternative rules introduced.

Reject submissions expressing general opposition to the Chapter.

Accept submission expressing general support for the chapter.

4.23.3.1 Recommended changes to provision

None. See other sections of this report for recommended changes in relation to the definition of HEL (Schedule A), inclusion of specific reference to Te Ao Maori chapter (Policy 12-1) and changes to provisions for maintenance of networks (Policy 5-3).

4.24 Recommendation Land 24 Chapter 12 Policy General

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
FISH & GAME NEW ZEALAND - WELLINGTON REGION	417	67	Policies are supported and we wish to have them retained.	Accept
	X 495	218	RUAPEHU DISTRICT COUNCIL - Oppose	Reject

4.24.1 Summarise submission points

(a) Support provision.

4.24.2 Recommendation

Accept submission supporting provision.

4.24.2.1 Recommended changes to provision

None.

4.25 Recommendation Land 25 Policy 12-1 Consent decision-making for vegetation clearance and land disturbance

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
RUAPEHU DISTRICT COUNCIL	151	135	[Reference also to Policy 12-1] (a) Rewrite this Section in accordance with Part 3 of the First Schedule to the RMA; or (b) Amend Policy 12-2 so that consultation and agreement with the appropriate Road Controlling Authority is required prior to adopting any Codes of Practice or industry standards for roading activities.	Reject
	X 481	200	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 498	25	TRANSIT NEW ZEALAND - Support	Reject
HORIZONS REGIONAL COUNCIL	182	23	Remove sub-clauses (b) and (f) from Policy 12-1	Accept
	X 533	38	FEDERATED FARMERS OF NEW ZEALAND INC - Support	Accept
NOEL OLSSON	227	2	I would suggest that the time has more than come for Horizons to have a policy in place, maybe by adding a sub clause under 12.1	Reject
TRANSPower NEW ZEALAND LTD	265	13	D. Retain Policy 12-1 without further modification.	Accept in part
	X 522	295	MERIDIAN ENERGY LIMITED - Oppose	Reject
ERNSLAW ONE LTD	269	3	Amend this policy to equally include a Whole of Forest Business Plan	Reject
	X 501	27	ERNSLAW ONE LTD - Support	Reject
P F OLSEN LIMITED	305	7	Embedded within this section should be a list clarifying the key elements that will be used to inform the decision enforcing the requirement for a whole farm plan	Reject
	X 501	109	ERNSLAW ONE LTD - Support	Reject
HORTICULTURE NEW ZEALAND	357	107	Decision Sought: Amend Policy 12-1 so that the matters to which Council may have regard are clearly specified and certain as to the scope.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 511	387	TRUST POWER LIMITED - Oppose	Accept
MIGHTY RIVER POWER	359	93	Include in (b) a reference to environmental plans that may be required as a condition of consent	Accept in part
MIGHTY RIVER POWER	359	94	Delete (g)	Accept in part
	X 522	296	MERIDIAN ENERGY LIMITED - Support	Accept in part
MIGHTY RIVER POWER	359	95	Retain the reference to Chapter 3 in (i) of the policy.	Accept
	X 511	383	TRUST POWER LIMITED - Support	Accept
	X 522	297	MERIDIAN ENERGY LIMITED - Support	Accept
	X 522	518	MERIDIAN ENERGY LIMITED - Support	Accept
MIGHTY RIVER POWER	359	96	Add a new sub clause to read as follows: The ability to remedy or mitigate adverse effects.	Accept in part
	X 511	384	TRUST POWER LIMITED - Support	Accept in part
MERIDIAN ENERGY LIMITED	363	136	Meridian opposes Policy 12-1 as currently worded and requests it is amended as follows or similar: Add a new condition whether a renewable energy development plan will be required as a condition of consent"; Any consequential amendments necessary to give effect to this submission	Reject
	X 519	26	MIGHTY RIVER POWER - Support	Reject
MERIDIAN ENERGY LIMITED	363	137	Meridian opposes Policy 12-1 as currently worded and requests it is amended as follows or similar: Amend condition (h) to delete the word minimise" and replace with avoid, remedy or mitigate" adverse effects; Any consequential amendments necessary to give effect to this submission	Reject
	X 511	385	TRUST POWER LIMITED - Support	Reject
	X 519	27	MIGHTY RIVER POWER - Support	Reject

Submitter	Number	Point	Decision Sought	Recommendation
MERIDIAN ENERGY LIMITED	363	138	Meridian opposes Policy 12-1 as currently worded and requests it is amended as follows or similar: Delete condition (g); Any consequential amendments necessary to give effect to this submission	Reject
MERIDIAN ENERGY LIMITED	363	139	Meridian opposes Policy 12-1 as currently worded and requests it is amended as follows or similar: Amend condition (i) to refer to renewable energy generation facilities". Any consequential amendments necessary to give effect to this submission	Reject
MINISTER OF CONSERVATION	372	132	Replace 'or' at the end of Policy 12.1 g (i) with 'and'	Reject
RURAL WOMEN NEW ZEALAND	380	17	Therefore, RWNZ submits that policy 12.1(b) be deleted and that all references in the rules that express or imply the compulsory imposition of WFBPs, as a condition of consent, be deleted.	Reject
	X 501	199	ERNSLAW ONE LTD - Oppose	Accept
ENVIRONMENTAL WORKING PARTY	386	92	Add: (b) the objectives and policies of Chapter 4 to Policy 12-1	Reject
ARBOR MANAGEMENT LIMITED	391	9	Amend this policy to equally include a Whole of Forest Business Plan.	Reject
	X 501	220	ERNSLAW ONE LTD - Support	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	124	Retain 12-1 (a), (c) and (d) as written pending suggestions changes to chapters 5 and 6 and policy 12-3.	Accept in part
FEDERATED FARMERS OF NEW ZEALAND INC	426	125	Delete 12-1(b)	Accept
FEDERATED FARMERS OF NEW ZEALAND INC	426	126	12-1(f) Define "sensitive" or use appropriately defined wording.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
NGA PAE O RANGITIKEI	427	92	Add: (b) the objectives and policies of Chapter 4 to Policy 12-1	Reject
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	93	Submitter supports Policy 12-1 Consent decision-making for vegetation clearance and land disturbance	Accept
	X 495	219	RUAPEHU DISTRICT COUNCIL - Oppose	Reject
	X 511	386	TRUST POWER LIMITED - Oppose	Reject

4.25.1 Summarise submission points

- (a) Include provisions enforcing requirements of WFBPs.
- (b) Delete reference to WFBPs.
- (c) Modify the definition of WFBPs to include activities other than farming (eg. forestry).
- (d) Include specific reference to the objectives and policies of Chapter 4 – Te Ao Maori
- (e) Amendments to specific wording, including removing the word ‘minimise’ and replace ‘or’ with ‘and and the end of (g)(i).
- (f) Delete (f) relating to effects on sensitive areas.
- (g) Delete (g) relating to appropriateness of adopting best practicable options.
- (h) Add new clause related to renewable energy plans or environmental plans required as conditions of consent.
- (i) General support.

4.25.2 Evaluation

Whole Farm Business Plans are a voluntary method. This is clearly articulated in the objectives and policies of the Land chapter. As such, it is not considered appropriate to make provision in this policy for WFBPs to be a compulsory requirement via a resource consent. To do so would undermine the voluntary nature of the programme. I therefore agree with those submitters who seek to remove clause (b) from the policy. I do not, therefore, agree with the submitter seeking to include additional provisions enforcing requirements of WFBPs.

Expanding the definition of WFBPs in the POP to include activities that the WFBP programme is not currently set up to address is not considered to be appropriate. Should the WFBP programme be extended to include other activities such as forestry, or should the forestry industry develop a Whole Forest Business Plan programme, then it would be most appropriate to introduce those changes to the POP by way of a plan change at that time.

As discussed in previous sections of this report, I consider it is necessary to include specific reference to the objectives and policies of Chapter 4 – Te Ao Maori in Policy 12-1 of this chapter. Sub clause (i) of Policy 12-1 identifies the chapters of the POP in which objectives and policies relevant to the assessment of resource consent applications are located. As consideration of the provisions of the Te Ao Maori chapter will be important for consideration in relation to resource consent applications, I agree with the submitters that there should be direct reference to those provisions in this sub clause. I note that the current wording of (i) does not specify the relevant objectives and policies of other chapters, which I consider is appropriate to assist plan readers in clearly understanding which provisions apply. I therefore recommend the inclusion of reference to the relevant objectives and policies of the Te Ao Maori chapter in (i) and to amend the remaining reference to other chapters to specifically refer to the relevant objectives and policies of those chapters.

Previous sections of my report have addressed the use of the term ‘minimise’. I will not repeat that discussion other than to conclude that in the context of a policy, the term minimise is considered to be appropriate. It implies reducing the effects to the lowest possible level, which requires a recognition of what is ‘possible’. On a case-by-case basis, the lowest possible effects will vary depending on a wide range of factors. To include a more specific level of attainment would unlikely be achievable.

The two alternative gateways provided in (g) are intended to be independent of each other. There will be circumstances where it is appropriate to implement best practicable options where only one of the situations in (i) and (ii) occur. There may be a situation where the numerical standards for the level of protection are known, but there is extreme difficulty or cost in actually determining the likely effect of an activity on those standards. Therefore I do not consider it necessary to exchange ‘or’ with ‘and’ as to do so would require both tests to be achieved simultaneously. I also consider that it is important to specifically provide for best practicable options to be adopted in situations of uncertainty as they have been developed as methods to minimise adverse effects in the majority of situations, and therefore I consider that this clause should remain in the policy.

Submitters have requested that clause (f) be deleted as it is most likely that the effects on sensitive areas will only be as a result of erosion or sediment. The other clauses in the policy provide for appropriate management of erosion and sediment discharge and it is therefore unnecessary to define the types of activities that the erosion or sediment may have an effect on (if the erosion and sediment discharges are managed, the effects on sensitive activities should therefore also be managed). I agree with the submitters who request removal of this provision.

I do not consider that it is necessary to specifically mention environmental plans that may be developed by resource consent applicants to manage the effects of their activities. The considerations required by the policy make it possible that the use of environmental management plans may be the best method for achieving the necessary performance standards (rather than a number of individual consent conditions). It would therefore be appropriate to include a consent condition requiring compliance with such a plan. Whether environmental management plans are developed for specific projects is a matter of applicant discretion – in some instances, the effects of a project can be managed effectively through conditions alone, while in other situations a comprehensive environmental management plan may be a more appropriate method for managing effects.

4.25.3 Recommendation

Reject submissions requesting to include provisions enforcing requirements of WFBPs.

Accept submissions requesting to delete reference to WFBPs.

Reject submissions requesting WFBP definition is widened to include forestry activities.

Accept in part submissions requesting to include specific reference to the objectives and policies of Chapter 4 – Te Ao Maori

Reject submissions requesting amendments to specific wording, including removing the word ‘minimise’ and replace ‘or’ with ‘and and the end of (g)(i).

Accept submissions requesting to delete (f) relating to effects on sensitive areas.

Reject submissions requesting to delete (g) relating to appropriateness of adopting best practicable options.

Reject submissions requesting to add new clause related to renewable energy plans or environmental plans required as conditions of consent.

Accept submissions that express general support for the policy.

4.25.3.1 Recommended changes to provision

Delete clauses (b) and (f).

Amend clause (i) to:

- (i) Objective 2-1: Consent duration, review and enforcement; Policy 2-1: Consent conditions; Policy 2-2: Consent durations; Policy 2-3 Consent review; Policy 2-4: Sites with multiple activities, and activities covering multiple sites; Objective 3-1: Infrastructure and energy; Policy 3-1: Benefits of infrastructure; Policy 3-2: Adverse effects of their activities on infrastructure; Policy 3-3 Adverse effects of infrastructure on the environment; Objective 4-1: Environmental management; Policy 4-1 Hapu and iwi involvement in resource management; Policy 4-2 Waahi tapu, waahi tupuna and other sites of significance; Policy 4-4: Other environmental issues; Objective 7-1 indigenous biological biodiversity; Objective 7-2:

Landscapes and natural character; Policy 7-2 Activities in Rare and Threatened Habitats; Policy 7-3: Activities in at-risk habitats; Policy 7-4: Proactive management of representative habitats; Policy 7-6: Pest plants and animals; Policy 7-7: outstanding landscapes; Policy 7-8: Natural character; Policy 7-10 historic heritage; Objective 10-1: Effects of natural hazard events; Policy 10-2: Development in areas prone to flooding; Policy 10-3: Activities that need to be located in areas prone to flooding; Policy 10-4: Critical infrastructure; Policy 10-5: Other types of natural hazards; Policy 10-6: Climate change.

4.26 Recommendation Land 26 Chapter 12 Policy 12-2 Recognition of industry standards

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
RUAPEHU DISTRICT COUNCIL	151	136	(c) The Environment Code of Practice for River Works be expanded to include all works undertaken in the Region, by Regional Council, District Council or those with delegated authority.	Reject
	X 481	201	PALMERSTON NORTH CITY COUNCIL - Support	Reject
TARARUA DISTRICT COUNCIL	172	66	[Reference also made to Policy 12-1] Withdraw the whole plan; or - Rewrite this section in accordance with Part 3 of the First Schedule to the RMA; or amend - Policy 12-2 so that consultation and agreement with the appropriate road controlling authority is required prior to adopting any codes of practice or industry standards for roading activities.	Reject
	X 481	337	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 498	26	TRANSIT NEW ZEALAND - Support	Reject
TRANSPower NEW ZEALAND LTD	265	14	D. Retain Policy 12-2 without further modification.	Accept
	X 495	220	RUAPEHU DISTRICT COUNCIL - Oppose	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 502	115	NEW ZEALAND DEFENCE FORCE - Support	Accept
ERNSLAW ONE LTD	269	4	Adopt recommendations as stated in the plan that support non regulatory methods for achieving sustainable management.	Accept in part
	X 484	24	MINISTRY OF AGRICULTURE & FORESTRY - Support	Withdrawn
	X 501	28	ERNSLAW ONE LTD - Support	Accept in part
	X 520	9	N Z FOREST MANAGERS LTD - Support	Accept in part
HOROWHENUA DISTRICT COUNCIL	280	69	[Reference also made to Policy 12-1] - Rewrite this section in accordance with Part 3 of the First Schedule to the RMA; or amend - Policy 12-2 so that consultation and agreement with the appropriate road controlling authority is required prior to adopting any codes of practice or industry standards for roading activities.	Reject
	X 481	430	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 498	28	TRANSIT NEW ZEALAND - Support	Reject
WANGANUI DISTRICT COUNCIL	291	86	[Reference also made to Policy 12-1] - Withdraw the whole plan; or - Rewrite this section in accordance with Part 3 of the First Schedule to the RMA; or - Amend Policy 12-2 so that consultation and agreement with the appropriate road controlling authority is required prior to adopting any codes of practice or industry standards for roading activities.	Reject
	X 481	546	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 498	29	TRANSIT NEW ZEALAND - Support	Reject
	X 498	35	TRANSIT NEW ZEALAND - Oppose	Accept
P F OLSEN LIMITED	305	10	As with submission on policy 5.5 3.Consider working with industry to create a small compact set of specific requirements applicable to defined catchment/geological conditions that combined with the Forestry Environmental Code form the basis of permitted	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			activity status subject to rules.	
	X 501	82	ERNSLAW ONE LTD - Support	Reject
	X 520	22	N Z FOREST MANAGERS LTD - Support	Reject
P F OLSEN LIMITED	305	11	As with submission on policy 5.5 4.Look at revising the extent to which controlled consent is required given the above.	Reject
	X 501	83	ERNSLAW ONE LTD - Support	Reject
	X 520	23	N Z FOREST MANAGERS LTD - Support	Reject
P F OLSEN LIMITED	305	8	As with submission on policy 5.5 1.Allocate some resources toward ensuring land and water based biodiversity data and mapping is available to industry for incorporation into Company GIS systems at little of no cost.	Reject
	X 501	110	ERNSLAW ONE LTD - Support	Reject
	X 520	20	N Z FOREST MANAGERS LTD - Support	Reject
P F OLSEN LIMITED	305	9	As with submission on policy 5.5 2.Create a web portal or disk for use by small scale players where the classifications and associated data can be easily scaled and matched against cadastral boundaries.	Reject
	X 501	111	ERNSLAW ONE LTD - Support	Reject
	X 520	21	N Z FOREST MANAGERS LTD - Support	Reject
RAYONIER N Z LIMITED	310	15	Recognition and endorsement by Horizons of the New Zealand Environmental Code of Practice for Plantation Forestry V1 developed by the New Zealand Forest Owners Association.	Reject
	X 501	118	ERNSLAW ONE LTD - Support	Reject
	X 520	49	N Z FOREST MANAGERS LTD - Support	Reject
NEW ZEALAND DEFENCE FORCE	330	30	2.Retain Policy 12-2 as is in the Proposed One Plan.	Accept in part
	X 495	222	RUAPEHU DISTRICT COUNCIL - Oppose	Reject

Submitter	Number	Point	Decision Sought	Recommendation
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	15	Retain and give effect to Policy 12.2.	Accept in part
	X 495	221	RUAPEHU DISTRICT COUNCIL - Oppose	Reject
	X 501	155	ERNSLAW ONE LTD - Support	Accept
	X 502	116	NEW ZEALAND DEFENCE FORCE - Support	Accept
	X 520	69	N Z FOREST MANAGERS LTD - Support	Accept
TRANSIT NEW ZEALAND	336	26	That this policy be retained in the plan and that Council recognise Transits industry standards as being appropriate to ensure that any adverse effects arising from state highway maintenance and construction works on the environment are avoided, remedied or mitigated.	Accept in part
	X 502	114	NEW ZEALAND DEFENCE FORCE - Support	Accept in part
MANAWATU DISTRICT COUNCIL	340	88	[Reference also to Policy 12-1] - Amend Policy 12-2 so that consultation and agreement with the appropriate road controlling authority is required prior to adopting any codes of practice or industry standards for roading activities, or. - Rewrite this section in accordance with Part 3 of the First Schedule to the RMA; or	Reject
	X 481	644	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 498	30	TRANSIT NEW ZEALAND - Support	Reject
RANGITIKEI DISTRICT COUNCIL	346	66	[Reference also made to Policy 12-1] - Rewrite this section in accordance with Part 3 of the First Schedule to the RMA; or amend - Policy 12-2 so that consultation and agreement with the appropriate road controlling authority is required prior to adopting any codes of practice or industry standards for roading activities.	Reject
	X 481	771	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 498	27	TRANSIT NEW ZEALAND - Support	Reject

Submitter	Number	Point	Decision Sought	Recommendation
HORTICULTURE NEW ZEALAND	357	108	Decision Sought: Amend Policy 12-2 to provide greater certainty as to how industry based standards will be incorporated into the Plan as a means of compliance with the Plan requirements.	Accept in part
RURAL WOMEN NEW ZEALAND	380	18	Therefore, RWNZ submits that either policy 12.2 is deleted from the Plan or Council will need to form a dairy industry group to lead all of Council's decisions affecting dairy land and water resources in the future.	Reject
DAVID LEONARD HOPKINS	382	6	Non specifically requested but asks in regard to Policy 12-2: Policy recognition of industry standards; "Do these include Fonterra's recently announced environmental standards?"	Reject
ARBOR MANAGEMENT LIMITED	391	7	Adopt recommendations as stated in the plan that support non regulatory methods for achieving sustainable management	Accept in part
	X 501	218	ERNSLAW ONE LTD - Support	Accept in part
	X 520	106	N Z FOREST MANAGERS LTD - Support	Accept in part
FEDERATED FARMERS OF NEW ZEALAND INC	426	127	Retain as written	Accept
	X 502	117	NEW ZEALAND DEFENCE FORCE - Support	Accept
ANGUS GORDON	447	1	Rewrite this section taking into account the practicality of how the rules will be implemented.	Reject
ANGUS GORDON	447	2	Remove all reference to the FSC scheme.	Reject
	X 501	283	ERNSLAW ONE LTD - Support	Reject
ANGUS GORDON	447	3	Re-evaluate and rewrite this rule taking into account the recently released forest industry code of practice.	Reject
	X 501	284	ERNSLAW ONE LTD - Support	Reject
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	94	Submitter supports Policy 12-2: Recognition of industry standards and requests amendment to ensure non-industry stakeholders are involved in the development of industry standards and codes of practice. "This will increase the credibility of the former and help to engender wider support for industry based standards."	Reject
	X 495	223	RUAPEHU DISTRICT COUNCIL - Oppose	Accept

Submitter	Number	Point	Decision Sought	Recommendation
	X 501	293	ERNSLAW ONE LTD - Oppose	Accept

4.26.1 Summarise submission points

- (a) Create greater certainty as to how standards will be incorporated into the POP.
- (b) Amend references to forestry standards.
- (c) Make provision for Environment Code of Practice for River Works.
- (d) Require consultation with roading control authority prior to adopting standards for roading activities.
- (e) Recognise Transit's industry standards.
- (f) General support for provision.

4.26.2 Evaluation

Submitters request greater certainty as to how standards will be incorporated into the POP. Standards will be incorporated via plan change or variation. This can be either a privately initiated plan change (initiated by the relevant industry sector wishing to insert the code/standard) or can be promoted by Horizons (s65 of the Act). As the process by which a regional plan change is promoted and undertaken is specified in the Act, I also refer you to the Planning Report for the Overall One Plan which discusses how the POP has complied with Part 3 of the First Schedule. I do not consider that it is necessary to repeat this process in the POP as it is sufficiently well defined in the Act.

As previously discussed, the current NZ Environmental Code of Practice for Plantation Forestry V1 has been considered by Horizons and does not currently meet the requirements for a code of practice or standard that can be inserted into the POP as it does not achieve the matters specified in Policy 12-1 or it does not contain provisions that are enforceable or certain. The Forestry Stewardship Council accreditation programme has been included as it currently meets the requirements for a code/standard. As previously mentioned, Horizons is in discussions with representatives of the forestry industry in relation to this matter and welcomes on-going discussions. Where a modification to the forestry industry's preferred code of practice occurs in order for it to achieve the necessary requirements for inclusion in the POP, Horizons would welcome an approach to incorporate it into the POP.

Submitters request that the POP make provision for Environment Code of Practice for River Works. This will be addressed in the section of the report which relates to the relevant rules to which it applies (Rules 12-5 and 12-7). In summary, it is agreed that the Code should be inserted into the POP and the rules modified accordingly.

Require consultation with roading control authority prior to adopting standards for roading activities. Negotiations and discussions between those seeking to establish a code/standard in relation to management of activities on roads and landowners affected by it (including road controlling authorities) is a process that sits outside the POP. Furthermore, any addition of standards relating to roading activities to the POP would follow a public submissions process (by way of a plan change application) at which time road controlling authorities would have an opportunity to consider the standards if they have not already done so. I consider that the processes for consultation should not be included as requirements within the POP and therefore no changes to the Policy are considered necessary.

Horizons would be happy to meet and discuss with Transit how its industry standards meet the criteria necessary to be included in the POP. Should Transit consider that the current standards are able to be inserted into the POP in their current form, evidence to this end may be presented at the hearing for consideration.

4.26.3 Recommendation

Reject submissions requesting greater certainty be specified in the Policy.

Reject submissions requesting insertion or removal of references to current forestry standards.

Accept in part submissions requesting inclusion of River Works Code of Practice in the POP.

Reject submissions requesting requirement for road controlling authorities to be consulted.

Reject submission requesting inclusion of Transit industry standards.

Accept submissions expressing general support for provision.

4.26.3.1 Recommended changes to provision

None. River works COP will be addressed at section on the relevant rules (Rule 12-5).

4.27 Recommendation Land 27 Chapter 12 Policy 12-3 Important and essential activities

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
VECTOR GAS LIMITED	115	9	Amend the following under section 12.1 Policies, Policy 12-3: Important and essential activities. "The Regional Council will generally allow vegetation clearance or land disturbance associated with an activity that is important or essential to the well-being of local communities, the Region or a wider area of New Zealand. Such activities might include, but not be limited to, vegetation clearance or land disturbance associated with natural hazard management and the provision of critical infrastructure."	Accept in part
HIGGINS GROUP	153	6	The Regional Council will generally allow vegetation clearance or land disturbance*associated with an activity that is important or essential to the well-being of local communities, the Region or a wider area of New Zealand. Such activities might include, but not be limited to, vegetation clearance or land disturbance associated with natural hazard management, gravel and aggregate extraction and the provision of essential infrastructure.	Accept in part
TARARUA DISTRICT COUNCIL	172	67	- Policy 12-3 be amended to read: "The Regional Council will generally allow vegetation clearance or land disturbance associated with an activity that is important or essential to the well-being of local communities, the Region or a wider area of New Zea	Accept in part
	X 481	338	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 522	299	MERIDIAN ENERGY LIMITED - Support in Part	Accept in part
THE AGGREGATE & QUARRY ASSOCIATION OF NEW ZEALAND LTD	230	4	Include a reference to mineral/aggregate resources in policy 12-3 ('Important and essential activities').	Reject
TRANSPower NEW ZEALAND LTD	265	15	D. Retain Policy 12-3 without further modification.	Accept in part
	X 495	225	RUAPEHU DISTRICT COUNCIL - Oppose	Reject
	X 522	298	MERIDIAN ENERGY LIMITED - Support in Part	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
HOROWHENUA DISTRICT COUNCIL	280	70	Policy 12-3 be amended to read: "The Regional Council will generally allow vegetation clearance or land disturbance associated with an activity that is important or essential to the well-being of local communities, the Region or a wider area of New Zealand, and recognised under Policy 3-1. Such activities might include"	Accept in part
	X 481	431	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 522	301	MERIDIAN ENERGY LIMITED - Support in Part	Accept in part
WANGANUI DISTRICT COUNCIL	291	87	Policy 12-3 be amended to read: "The Regional Council will generally allow vegetation clearance or land disturbance associated with an activity that is important or essential to the well-being of local communities, the Region or a wider area of New Zealand, and recognised under Policy 3-1. Such activities might include"	Accept in part
	X 481	547	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 522	302	MERIDIAN ENERGY LIMITED - Support in Part	Accept in part
TRANSIT NEW ZEALAND	336	27	Define 'essential infrastructure' in Glossary 3 to included state highways.	Accept in part
MANAWATU DISTRICT COUNCIL	340	89	Policy 12-3 be amended to read: "The Regional Council will generally allow vegetation clearance or land disturbance associated with an activity that is important or essential to the well-being of local communities, the Region or a wider area of New Zealand, and recognised under Policy 3-1. Such activities might include ..."	Accept in part
	X 481	645	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 522	303	MERIDIAN ENERGY LIMITED - Support in Part	Accept in part
RANGITIKEI DISTRICT COUNCIL	346	67	- Policy 12-3 be amended to read: "The Regional Council will generally allow vegetation clearance or land disturbance associated with an activity that is important or essential to the well-being of local communities, the Region or a wider area of New Zea	Accept in part
	X 481	772	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 522	300	MERIDIAN ENERGY LIMITED - Support in Part	Accept in part
HORTICULTURE NEW	357	109	Decision Sought: Amend Policy 12-3 to provide greater certainty as to how	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
ZEALAND			assessment will be made as to what are 'important or essential' activities and how they will be incorporated into the Plan as a means of compliance with the Plan requirements.	
TRUST POWER LIMITED	358	74	<p>Amend Policy 12-3 of the Proposed Plan as follows: The Regional Council will generally allow vegetation clearance or land disturbance associated. Such activities might include, but not be limited to, vegetation clearance or land disturbance associated with natural hazard management and the provision of essential infrastructure (such as energy development)</p> <p>Any similar amendments with like effect. Any consequential amendments that stem from the amendment of Policies 12-3 and 12-4 as proposed in this submission.</p>	Accept in part
	X 522	304	MERIDIAN ENERGY LIMITED - Support in Part	Accept in part
	X 525	230	GENESIS POWER LTD - Support	Accept in part
MIGHTY RIVER POWER	359	98	The addition of an asterisk after the words essential infrastructure.	Reject
MERIDIAN ENERGY LIMITED	363	140	<p>Meridian requests that sentence 2 of Policy 12-3 is amended as follows or similar:</p> <p>Such activities might include, but not be limited to, vegetation clearance and land disturbance associated with natural hazard management, renewable energy generation, and the provision of essential infrastructure.</p> <p>Any consequential amendments necessary to give effect to this submission</p>	Reject
	X 511	389	TRUST POWER LIMITED - Support	Reject
MINISTER OF CONSERVATION	372	133	Either delete 'important' or reword policy to indicate that the Council will consider the importance or essential nature of such activities or reword as an objective 'to provide for activities that are important or essential to the well-being of communities etc .	Accept in part
	X 511	392	TRUST POWER LIMITED - Oppose	Reject

Submitter	Number	Point	Decision Sought	Recommendation
FEDERATED FARMERS OF NEW ZEALAND INC	426	128	Reword policy 12-3 as follows: The Regional Council will allow vegetation clearance or land disturbance associated with an activity that is important or essential to the well-being of, individuals, local communities the Region and/or the wider area of New Zealand. Such activities might include, but not limited to, vegetation clearance or land disturbance associated with natural hazard management and the provision of essential infrastructure. (or words to this effect)	Accept in part
	X 492	195	MINISTER OF CONSERVATION - Oppose	Reject
	X 511	391	TRUST POWER LIMITED - Support	Accept in part
ANGUS GORDON	447	4	Provide a clear and concise definition of" HEL" for all lithologies and slopes.	Accept in part
	X 501	285	ERNSLAW ONE LTD - Support	Accept in part
ANGUS GORDON	447	5	Consider the concept of setting up a system for whole of forest management and harvest plans.	Accept in part
	X 501	286	ERNSLAW ONE LTD - Support	Accept in part
ANGUS GORDON	447	6	Re-write this rule with more relevant slope angles specified.	Accept in part
	X 501	287	ERNSLAW ONE LTD - Support	Accept in part
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	95	Submitter supports Policy 12-3: Important and essential activities	Accept in part
	X 511	390	TRUST POWER LIMITED - Support	Accept in part

4.27.1 Summarise submission points

- (a) Better define what is meant by 'important or essential' by adding additional examples.
- (b) General support

4.27.2 Evaluation

I agree with the submitters that the current wording of the provision referring to important and essential activities is not clear. I consider that Policy 12-3 is intended to refer to enabling land disturbance and vegetation clearance associated with the management of natural hazards and the provision of infrastructure of regional and national importance (as defined in Policy 3-1). Therefore I propose to amend the policy to include only those two activities to remove the uncertainty currently present.

4.27.3 Recommendation

Accept in part submissions requesting specific changes to the wording of the policy.
Accept submissions expressing support for the policy.

4.27.3.1 Recommended changes to provision

Amend Policy 12-3 to:

The Regional Council will generally allow vegetation clearance or land disturbance* associated with ~~an activity that is important or essential to the well-being of local communities, the Region or a wider area of New Zealand. Such activities might include, but not be limited to,~~ vegetation clearance* or land disturbance* associated with the provision of infrastructure of regional and national importance (as defined in Policy 3-1) and natural hazard management. ~~And the provision of essential infrastructure.~~*

Changes requested by submitters outside the scope of this policy are addressed in other sections of this report.

4.28 Recommendation Land 28 Chapter 12 Policy 12-4 Large-scale consents

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
MARION GILLARD	46	5	Amount to be cleared has some relevance to the size of the property.	Accept in part
RUAPEHU DISTRICT COUNCIL	151	138	(b) A new clause (c) be added to Policy 12-4 as follows: (c) a roading network managed and operated by a local Authority or Transit New Zealand	Reject
	X 481	203	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 498	31	TRANSIT NEW ZEALAND - Oppose	Accept
RUAPEHU DISTRICT COUNCIL	151	139	A new clause (d) be added to Policy 12-4 as follows: (a) other infrastructure of Regional importance (b) Roadside spaying of vegetation for maintenance purposes be excluded.	Reject
	X 481	204	PALMERSTON NORTH CITY COUNCIL - Support	Reject
TARARUA DISTRICT COUNCIL	172	68	A new clause (c) be added to Policy 12-4 as follows: (c) "a roading network managed and operated by a local authority or Transit New Zealand"	Reject
	X 481	339	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 498	32	TRANSIT NEW ZEALAND - Oppose	Accept
PALMERSTON NORTH CITY COUNCIL	241	100	That Horizons adopt Policy 12-4.	Accept
	X 495	226	RUAPEHU DISTRICT COUNCIL - Oppose	Reject
	X 500	294	TARARUA DISTRICT COUNCIL - Support	Accept
	X 501	17	ERNSLAW ONE LTD - Support	Accept
	X 502	120	NEW ZEALAND DEFENCE FORCE - Support	Accept
	X 507	294	MANAWATU DISTRICT COUNCIL - Support	Accept

Submitter	Number	Point	Decision Sought	Recommendation
	X 515	293	HOROWHENUA DISTRICT COUNCIL - Support	Accept
	X 517	282	RANGITIKEI DISTRICT COUNCIL - Support	Accept
	X 532	294	WANGANUI DISTRICT COUNCIL - Support	Accept
GENESIS POWER LTD	268	32	Retain Policy 12-4.	Accept
	X 501	22	ERNSLAW ONE LTD - Support	Accept
	X 502	119	NEW ZEALAND DEFENCE FORCE - Support	Accept
	X 511	393	TRUST POWER LIMITED - Support	Accept
	X 522	305	MERIDIAN ENERGY LIMITED - Support in Part	Accept
HOROWHENUA DISTRICT COUNCIL	280	71	A new clause (c) be added to Policy 12-4 as follows: (c)a roading network managed and operated by a local authority or Transit New Zealand	Reject
	X 481	432	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 498	34	TRANSIT NEW ZEALAND - Oppose	Accept
WANGANUI DISTRICT COUNCIL	291	88	A new clause (c) be added to Policy 12-4 as follows: (c) a roading network managed and operated by a local authority or Transit New Zealand	Reject
	X 481	548	PALMERSTON NORTH CITY COUNCIL - Support	Reject
P F OLSEN LIMITED	305	12	There is no clarity as to what type of consent will prevail, i.e. controlled, discretionary etc.	Reject
	X 501	84	ERNSLAW ONE LTD - Support	Reject
	X 520	24	N Z FOREST MANAGERS LTD - Support	Reject
P F OLSEN LIMITED	305	13	It is submitted that if a consent is still to be required for standard forestry activities, such a consent status should be confirmed as controlled and subject to the matters of consent as already listed and adjustments as noted regarding biodiversity. See submissions on Schedule E	Reject
	X 501	85	ERNSLAW ONE LTD - Support	Reject
	X 520	25	N Z FOREST MANAGERS LTD - Support	Reject

Submitter	Number	Point	Decision Sought	Recommendation
NEW ZEALAND DEFENCE FORCE	330	44	Retain Policy 12-4 as is in the Proposed One Plan	Accept in part
	X 501	148	ERNSLAW ONE LTD - Support	Accept in part
	X 522	306	MERIDIAN ENERGY LIMITED - Support in Part	Accept in part
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	16	Retain Policy 12.4	Accept
	X 501	156	ERNSLAW ONE LTD - Support	Accept
	X 502	118	NEW ZEALAND DEFENCE FORCE - Support	Accept
	X 520	70	N Z FOREST MANAGERS LTD - Support	Accept
MANAWATU DISTRICT COUNCIL	340	90	A new clause (c) be added to Policy 12-4 as follows: (c) a roading network managed and operated by a local authority or Transit New Zealand	Reject
	X 481	646	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 498	36	TRANSIT NEW ZEALAND - Oppose	Accept
RANGITIKEI DISTRICT COUNCIL	346	68	A new clause (c) be added to Policy 12-4 as follows: (c) "a roading network managed and operated by a local authority or Transit New Zealand"	Reject
	X 481	773	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 498	33	TRANSIT NEW ZEALAND - Oppose	Accept
HORTICULTURE NEW ZEALAND	357	110	Decision Sought: Amend Policy 12-4 to provide greater certainty and clarity as to how what scale of activities will be determined to be large scale and widespread.	Reject
TRUST POWER LIMITED	358	75	Retain Policy 12-4 as read.	Reject
			Any similar amendments with like effect. Any consequential amendments that stem from the amendment of Policies 12-3 and 12-4 as proposed in this submission.	

Submitter	Number	Point	Decision Sought	Recommendation
	X 501	195	ERNSLAW ONE LTD - Support	Reject
	X 522	307	MERIDIAN ENERGY LIMITED - Support in Part	Reject
MERIDIAN ENERGY LIMITED	363	141	Meridian requests that Policy 12-4 is amended as follows or similar: Add a new condition as follows: (c)renewable energy generation facilities Any consequential amendments necessary to give effect to this submission	Reject
	X 511	394	TRUST POWER LIMITED - Support	Reject
NEW ZEALAND INSTITUTE OF FORESTRY	419	14	The NZIF contends that there is no clarity as to what type of consent will prevail, i.e. controlled, discretionary, etc. It is submitted that if a consent is still to be required for standard forestry activities, such a consent status should be confirmed as controlled and subject to the matters of consent as already listed and adjustments as noted regarding biodiversity. See submissions on Schedule E.	Reject
	X 501	228	ERNSLAW ONE LTD - Support	Reject
	X 520	125	N Z FOREST MANAGERS LTD - Support	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	129	Amend 12-4 to read: (c) agricultural land use activities	Accept
	X 511	395	TRUST POWER LIMITED - Oppose	Reject
ANGUS GORDON	447	7	Define Highly erodible land explicitly	Accept
	X 501	288	ERNSLAW ONE LTD - Support	Accept
ANGUS GORDON	447	8	Re-examine the necessity of specific slopes for unencumbered vegetation removal.	Accept in part
	X 501	289	ERNSLAW ONE LTD - Support	Accept in part
ANGUS GORDON	447	9	Include "upper slope limits over which vegetation clearance will be prohibited"	Reject
	X 501	290	ERNSLAW ONE LTD - Support	Reject

Submitter	Number	Point	Decision Sought	Recommendation
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	96	Submitter supports Policy 12-4: Large-scale consents	Accept
	X 492	196	MINISTER OF CONSERVATION - Support	Accept
	X 501	294	ERNSLAW ONE LTD - Support	Accept

4.28.1 Summarise submission points

- (a) Include 'agricultural land use activities'.
- (b) Include 'renewable energy generation facilities'.
- (c) Include 'roading networks'.
- (d) Include 'other infrastructure of regional importance'.
- (e) Clarify the type of consent that will prevail.
- (f) Specify the activity status for large-scale consents as 'controlled'.
- (g) General support.

4.28.2 Evaluation

I agree with the submitter that there are a number of instances where single agricultural land use operators undertake activities across a number of different locations. While the existing wording of the policy is inclusive of such activities, it is considered appropriate to include specific reference to 'agricultural land use activities'.

Renewable energy generation facilities may fall into this category (large-scale consents), however it is not considered necessary to specifically refer to these activities. It is more likely that the establishment of such activities will be within a defined area and therefore would normally be covered by a suite of consents relevant to that location. This policy is inclusive and where an applicant considers that there are merits in applying for resource consent/s to cover a large-scale renewable energy proposal, the policy enables the Council to consider such applications.

To make specific reference to 'roading networks' is not considered necessary as the reference to the 'common activities of network utility operators' already encompasses these activities.

The request to include ‘other infrastructure of regional importance’ is not considered necessary for the same reason mentioned above. The policy already includes sufficient flexibility to incorporate this.

The policy does not define the type of consent that will prevail for such activities as this will be dictated by the level of compliance within the relevant rules in the POP. This policy is not intended as a means of making such activities more or less permissive, rather it is a statement to enable efficiency in terms of obtaining and processing multiple resource consent applications. It makes it clear that the Council supports consideration, in appropriate situations, of applications covering widespread activities rather than expecting a number of related consents to be processed independently. However the process will still require that the same number of resource consents are processed/issued albeit that they are able to be applied for via a single application and processed in a comprehensive manner. For the same reason, I do not consider that it would be appropriate to specify the activity status for large-scale consents as ‘controlled’.

4.28.3 Recommendation

Accept in part submissions requesting to include ‘agricultural land use activities’.

Reject submissions requesting to include ‘renewable energy generation facilities’.

Reject submissions requesting to include ‘roading networks’.

Reject submissions requesting to include ‘other infrastructure of regional importance’.

Reject submissions seeking to clarify the type of consent that will prevail.

Reject submissions requesting to specify the activity status for large-scale consents as ‘controlled’.

Accept submissions the express general support.

4.28.3.1 Recommended changes to provision

Add ‘(c) Agricultural land use activities’

4.29 Recommendation Land 29 Chapter 12 Rules Sub Heading 12.2 Vegetation clearance and land disturbance rules

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
ANTHONY DAVID & GAYLENE MAY ATKINS	56	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new Rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	167	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
RICHARD JOHN & CORAL EVELYN EDWARDS	57	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	168	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
CLIFTON HOWARD TOMBLESON	58	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	169	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
PUKEKAHU FARM LTD	60	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	170	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
DAVID EARLE ROBINS MATTHEWS	65	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	
	X 502	171	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
LYN NEESON	77	4	I think you should redefine HEL land, consider the soil structure as well as the contour and produce more detailed, area specific maps that accurately reflect steeper land.	Accept in part
RUSSELL SULLIVAN	94	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	172	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
BRUCE EDWARD CULLEY	98	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	173	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
ALLAN FRANCIS O'NEIL & F J O'NEIL & SONS	113	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	144	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
PETER ALEXANDER ANDERSON	121	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 502	145	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
CLIFTON HOWARD TOMBLESON	133	3	I suggest, if you insist on going ahead with this folly, that: A: A Horizons staff member be available to inspect and assess whether or not a job presents a risk of erosion and then approve prospective jobs at 24 hours notice, irrespective of the degree of slope, or B: that contractors be authorised to assess whether or not a job presents a risk of erosion. That they can then decide if the job goes ahead or not.	Accept in part
HEATHER OLIVER	144	7	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	174	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
WINSTON OLIVER	145	8	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	178	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
JOHN COLLIER DONALD	154	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	146	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
BARRY & GLENDA WADE	155	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	
	X 502	147	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
COLIN CASELEY	156	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	148	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
WARRICK & SALLY STREET	157	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	149	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
KERRY JOHN THOMPSON	175	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	150	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
DONALD ALAN WINDLE	186	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	151	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
IAN DOUGLAS MC COUBRIE	187	7	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	
	X 502	175	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
RODNEY STEWART MC COUBRIE	188	7	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new Rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owner	Reject
	X 502	176	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
PATRICK WILLIAM CARROLL	189	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	152	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
STUART MC NIE	198	7	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	177	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
ROSEANNE PARKES	217	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	153	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
DAVID JOHN WELLS	223	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	
	X 502	154	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
RICHARD PORRITT	247	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	155	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
MATTHEW BLACK	248	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	156	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
ANDREW PORRITT	249	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	157	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
GEOFFREY THOMAS BURTON	271	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	158	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
FRASER LINDSAY HORROCKS	289	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	
	X 502	159	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
JOHN COLIN BLACK	292	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	160	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
GORDON GEORGE KUGGELEIJN	300	4	No decision requested but submitter does not concur with the 20 degree slope rule as indicated below The definition of "Highly erodible Land" being all land over 20 degrees slope. There are many places over 20 degrees that are NOT eroding and there are areas flatter than 20 degrees that could be highly erodible (riparian terraces). I believe this definition you include is flawed and cuts right across consideration of: soil types, rainfall, vegetation cover and land use. NZ has soil types and erodibility values already recorded (land classification maps) and horizons employs experts in this field already (soil conservators) so why reinvent the wheel.	Accept in part
BLAIR PATRICK SHORTALL	302	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	161	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
PIRIE CONSULTANTS LTD, PACIFIC FARMS LTD, HOULT CONTRACTORS LTD, KEEGAN CONTRACTORS LTD, PARANUI CONTRACTORS LTD, RYMAN HEALTHCARE LTD, M & M	303	26	Permitted activity standards to include in all areas - The removal of vegetation of 1000m per year per property for residential purposes and 20ha for farming purposes - That there not be any limit for the removal of vegetation and land disturbance for activities associated with the provision of	Reject

Submitter	Number	Point	Decision Sought	Recommendation
EARTHMOVERS LTD, TITAN1 LTD AND O'HAGAN CONTRACTING LTD			roading and building sites within subdivisions or developments which are already subject to control from territorial authorities	
PIRIE CONSULTANTS LTD, PACIFIC FARMS LTD, HOULT CONTRACTORS LTD, KEEGAN CONTRACTORS LTD, PARANUI CONTRACTORS LTD, RYMAN HEALTHCARE LTD, M & M EARTHMOVERS LTD, TITAN1 LTD AND O'HAGAN CONTRACTING LTD	303	27	Permitted activity standards to include in all areas - That there not be any limit for the removal of vegetation and land disturbance for activities associated with the provision of roading and building sites within subdivisions or developments which are already subject to control from territorial authorities	Reject
JAMES TRUEBRIDGE & SUE YEREX	304	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	162	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
ATIHAU - WHANGANUI INCORPORATION	309	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	163	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
DONALD JAMES POLSON	329	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	164	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
	X 524	5	DEAN GREGORY SPARKES - Support	Reject
NEW ZEALAND DEFENCE FORCE	330	45	1.Amend section 12.2 where required to create controls based on disturbance per ha (i.e. in proportion to property size) OR	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
NEW ZEALAND DEFENCE FORCE	330	46	2.Re-introduce controls based on disturbance of contiguous areas.	Accept in part
GEORGE ANTHONY MATTHEWS	333	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	165	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
STEWART LESLIE MATTHEWS	342	5	I request the removal of rules 12.2, 12.3, 12.4, 12.5 from the Plan and the drafting of a new rule controlling significant adverse effects, which is appropriate to the site, allows normal farm activities to occur and has been developed as a result of meaningful consultation with potentially affected land owners	Reject
	X 502	166	NEW ZEALAND DEFENCE FORCE - Oppose	Accept
CLAYTON & MICHELLE POTTS	361	1	No decision requested but following objection raised We object to the amount of land that will be allowed to be dug up for tracks, fence lines etc, there has been no variation allowed if a landowner owns 100 or 1000 acres.	Reject
	X 502	121	NEW ZEALAND DEFENCE FORCE - Support	Reject
CLAYTON & MICHELLE POTTS	361	2	No decision requested but following objection raised We also object to the amount of vegetation/scrub allowed to be cleared on hill country land, again no allowance has been made for a larger landowner over a smaller holding.	Reject
	X 502	122	NEW ZEALAND DEFENCE FORCE - Support	Reject
CLAYTON & MICHELLE POTTS	361	4	No decision requested but following objection raised Also we note that the definition of highly erodible land according to the HRC is hill country with a slope greater than 20 degrees, this measurement is far too broad for any area in New Zealand.	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
ELAINE GUBB & MICHAEL SANDERSON	362	1	No decision requested but following objection raised We object to the amount of land that will be allowed to be dug up for tracks, fence lines etc.	Reject
ELAINE GUBB & MICHAEL SANDERSON	362	2	No decision requested but following objection raised We also object to the amount of vegetation/scrub allowed to be cleared on hill country land,	Reject
ELAINE GUBB & MICHAEL SANDERSON	362	4	No decision requested but following objection raised Also we note that the definition of highly erodible land according to the HRC is hill country with a slope greater than 20 degrees, this measurement is far too broad for any area in New Zealand.	Accept in part
LANDLINK LTD	440	82	For section 12.2 we consider that all Discretionary Activities should be Restricted Discretionary Activities with a broad ambit of discretion and the Non-Complying Activity should be a Discretionary Activity	Accept in part
	X 501	264	ERNSLAW ONE LTD - Oppose	
FIONA DALGETY	455	1	Amend definition of highly erodible land	Accept in part
FIONA DALGETY	455	2	Ensure time requirements for processing consents eg. 20 days	Reject
FIONA DALGETY	455	3	Ensure availability of infield multiple consents at significantly reduced cost say \$50	Accept in part
FIONA DALGETY	455	4	Workings and applications of the whole farm business plans be amended	Reject

4.29.1 Summarise submission points

- (a) Remove vegetation clearance and land disturbance rules and replace with rules that control significant adverse effects.
- (b) Include rules that have been developed as a result of meaningful consultation with affected landowners.
- (c) Improve consent processing processes.

- (d) Amend definition of HEL, including removal of references to 20 degree slope.
- (e) Amend the areas and volumes of vegetation clearance and land disturbance permitted.
- (f) Amend reference to 'per property' to recognise that properties are of variable sizes (eg. change to a per hectare measure).
- (g) Amend discretionary activities to restricted discretionary activities and non-complying activities to discretionary activities.
- (h) Remove limits to vegetation clearance and land disturbance associated with subdivisions and developments already subject to territorial authority controls.

4.29.2 Evaluation

Current rules for vegetation clearance and land disturbance have been set up to enable a small amount of work to be undertaken where the Council is confident that the likelihood of the effects of that level of activity will be no more than minor. Given the variability of land types and the vulnerability to erosion, it is considered appropriate to set a relatively low limit for permitted vegetation clearance. The low limits also reduce the likelihood of larger scale activities with the potential to cause significant effect occurring cumulatively over a period of time. The limits set are not the point beyond which adverse effects will definitely occur, they are simply a trigger point beyond which it is important for careful consideration of the manner in which the proposed activity will be undertaken to minimise accelerated erosion.

Horizons has recognised that the low trigger value increases the likelihood of requiring consent for more activities. In response, Horizons propose to implement a 'consents in the field' approach so that trained Horizons staff can quickly assess proposals for vegetation clearance and land disturbance and effectively write the necessary consent 'in the field'. This approach is intended to avoid the more typical (and slower) resource consent process by recognising that the key requirement is for an assessment by a person with expertise in the avoidance and reduction of accelerated erosion. To this end, Horizons have made a submission to the POP requesting that the activity status for works that exceed the permitted activity standards is changed from Discretionary to Restricted Discretionary.

I currently consider that increasing the minimum volume and area standards for permitted activity vegetation clearance and land disturbance is not necessary and would increase the likelihood of such activities causing adverse effects on the environment. However the areas and volumes adopted in the POP may be too large in some situations, particularly in relation to enabling 1 hectare of vegetation clearance per property. It is a difficult balance between enabling people to undertake everyday activities important for their health, safety and well-being (such as being able to cut down vegetation for household firewood) and minimising the potential for accelerated erosion. The 1 hectare limit would seem to be an appropriate area for each property owner to be able to clear for everyday purposes, but may be sufficiently large an area to cause accelerated erosion once cleared. This is a discussion that may best occur at the hearing where the practical requirements of landowners can be discussed directly with submitters.

I consider that the permitted activity standards are not a signal to land owners that they definitely cannot undertake vegetation clearance and land disturbance, they are simply a trigger point to involve a level of expertise in the consideration of the appropriateness of the proposed activity.

As previously discussed, comprehensive consultation with landowners, stakeholders, industry groups and the wider community has been undertaken during the development of the POP. I consider that an appropriate level of consultation has been undertaken to date.

Earlier sections in this report discuss the amendment of the definition of HEL. This also includes removal of references to 20 degree slope in the rules as this does not reflect the variability in the other factors that contribute to whether land is highly erodible.

As discussed above, the standards in the permitted activity provisions are regarded as triggers for the involvement of Council expertise in the consideration of the proposed activity. The permitted activity standard relates to an area of highly erodible land per property rather than property per hectare basis. Basing the standard on a per hectare basis would mean that larger scale activities (such as tracking, which occur across a number of hectares) may not trigger the involvement of an erosion management expert and could therefore occur as a permitted activity. The per property measurement basis should have the added advantage of encouraging longer-term planning for land disturbance and vegetation clearance by each farmer or business owner to maximise the value obtained from each visit by an erosion management expert for resource consenting issues (it would be more efficient to identify several tracking and/or vegetation clearance activities intended for the following two years during the one consenting inspection). I note here that the standards for vegetation clearance and land disturbance on HEL do not apply to works being undertaken in accordance with a WFBP, which has involved expert consideration of the way in which such activities will occur and be located as part of a long-term programme.

The request of amend the activity status of some activities is considered appropriate to enable a more rapid consent assessment process which addresses only those matters that are relevant to the activity. The only non-complying activity within the Chapter refers to activities within rare or threatened habitats. This is a matter that will be considered in more detail in the Planning Report associated with the Living Heritage hearings.

Territorial authority responsibilities do not extend to the matters covered by rules in the POP. While there may be some cross-over in terms of managing the effects of vegetation clearance and land disturbance at both governance levels, the reasons for controlling those activities are different and therefore it is possible that the effects that are intended to be managed by Horizons would (or could) not be addressed by the territorial authority.

4.29.3 Recommendation

Reject submissions that request to include rules that have been developed as a result of meaningful consultation with affected landowners.

Accept in part submissions requesting to improve consent processing processes.

Accept in part submissions recommending to amend definition of HEL, including removal of references to 20 degree slope.

Reject submissions that request to amend the areas and volumes of vegetation clearance and land disturbance permitted.

Reject submissions that request to amend reference to 'per property' to recognise that properties are of variable sizes (eg. change to a per hectare measure).

Accept in part submissions requesting to amend discretionary activities to restricted discretionary activities and non-complying activities to discretionary activities.

Reject submissions requesting to remove limits to vegetation clearance and land disturbance associated with subdivisions and developments already subject to territorial authority controls.

4.29.3.1 Recommended changes to provision

Amend rule 12-4 in the following ways:

Amend Classification column to: *Restricted* Discretionary

Amend Conditions/Standards/Terms column to:

- (a) *The activity shall not take place in any rare or threatened habitat*.*
- (b) *The activity shall not take place on a coastal foredune or near a water body as regulated by Rule 12-5.*
- (c) *The activity shall not disturb any archaeological site, waahi tapu or koiwi remains as identified in any district plan, in the New Zealand Archaeological Association's Site Recording Scheme, or by the Historic Places Trust except where the Historic Places Trust approval in consultation with iwi for waahi tapu or koiwi remains has been obtained.*

Amend Control/Discretion/Non-notification column to:

Discretion is restricted to:

- (a) *The nature, scale, location, timing and duration of land disturbance*
- (b) *Compliance with the best management practices*
- (c) *Measures to maintain slope stability*
- (d) *The method of sediment retention and control of sediment run-off*
- (e) *Effects on riparian margins and water bodies*
- (f) *Effects on rare and threatened habitats* and at risk habitats**
- (g) *Effects on existing structures*
- (h) *Qualifications required of contractors*

- (i) Revegetation requirements
- (j) Procedures in the event of discovering or disturbing an archaeological site, waahi tapu or koiwi remains
- (k) Duration of consent
- (l) Review of consent conditions
- (m) Compliance monitoring

Resource consent applications under this rule will not be notified and written approval of affected persons will not be required (notice of applications need not be served on affected persons).

Amend definition of HEL. Please see recommendations in the section of this report which relates to Schedule A
Remove reference to 20 degree slopes from rules 12-2, 12-3 and 12-4 in the following ways:

- Delete clause (e) from Rule 12-2
- Delete clause (b) from Rule 12-3
- Delete clause (d) from Rule 12-4

4.30 Recommendation Land 30 Chapter 12 Rule General

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	28	Alternatively amending the relevant rules in Chapter 12 to give effect to the submissions set out above.	Reject
	X 501	169	ERNSLAW ONE LTD - Support	Reject
	X 520	82	N Z FOREST MANAGERS LTD - Support	Reject
TRUST POWER LIMITED	358	76	Delete Rules 12-1 12-8 from the Proposed Plan or delete any reference to rare, threatened and at-risk habitats from Rules 12-1 12-8. amend Rules 12-1 and 12-8 to include specific reference to infrastructure and energy development in the classification criteria.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			<p>amend the non-complying activity status of Rule 12-8 to become a discretionary activity.</p> <p>Any similar amendments to like effect. Any consequential amendments that stem from the amendment of Rules 12-1 12-8 as proposed in this submission.</p>	
	X 492	198	MINISTER OF CONSERVATION - Oppose	Accept
	X 522	228	MERIDIAN ENERGY LIMITED - Support in Part	Reject
	X 522	309	MERIDIAN ENERGY LIMITED - Support in Part	Reject
ENVIRONMENTAL WORKING PARTY	386	93	<p>12.4 Rules - Other activities</p> <p>(a)All activities involving Land Use Activities and Land-Based Biodiversity shall take into account chapter 4 (b) Remedial action for any adverse effects to the environment will be undertaken (c)Constant monitoring of activities will ensure compliance to the Resource Consent and all relevant legislation and regulations (d)The Regional Council will lobby the relevant legislative bodies to impose penalties for non compliance that: i) are appropriate to the adverse environmental effects ii) account for the remedial process, and iii) will act as a deterrent for those intending not to comply. (e)The relevant Maori/ iwi and/or hapu organisation shall be notified of any disturbance to sites of significance for Maori (f) The relevant Maori/ iwi and/or hapu organisation shall be notified of any discovery of koiwi (bones) or artifacts and any type of activity shall stop until the appropriate processes have been completed. (g) In the event of any unforeseen circumstances occurring from activities undertaken by the Resource applicant, remedial action will be undertaken to the satisfaction of Horizons Regional Council.</p>	Reject
	X 501	202	ERNSLAW ONE LTD - Oppose	Accept

Submitter	Number	Point	Decision Sought	Recommendation
	X 520	99	N Z FOREST MANAGERS LTD - Oppose	Accept
FISH & GAME NEW ZEALAND - WELLINGTON REGION	417	68	These are supported and we wish to have them retained.	Accept in part
	X 502	143	NEW ZEALAND DEFENCE FORCE - Oppose	Reject
NGA PAE O RANGITIKEI	427	93	12.4 Rules - Other activities (a)All activities involving Land Use Activities and Land-Based Biodiversity shall take into account chapter 4 (b) Remedial action for any adverse effects to the environment will be undertaken (c)Constant monitoring of activities will ensure compliance to the Resource Consent and all relevant legislation and regulations (d)The Regional Council will lobby the relevant legislative bodies to impose penalties for non compliance that: i) are appropriate to the adverse environmental effects ii) account for the remedial process, and iii) will act as a deterrent for those intending not to comply. (e)The relevant Maori/ iwi and/or hapu organisation shall be notified of any disturbance to sites of significance for Maori (f) The relevant Maori/ iwi and/or hapu organisation shall be notified of any discovery of koiwi (bones) or artifacts and any type of activity shall stop until the appropriate processes have been completed. (g) In the event of any unforeseen circumstances occurring from activities undertaken by the Resource applicant, remedial action will be undertaken to the satisfaction of Horizons Regional Council.	Reject
	X 501	253	ERNSLAW ONE LTD - Oppose	Accept

4.30.1 Summarise submission points

- (a) Reference to general role of Horizons.
- (b) Amend column 'Classification criteria' in the table to refer to 'infrastructure and energy development' in rules 12-1 to 12-8.
- (c) General support for rules.

4.30.2 Evaluation

Submitters making reference to the general role of Horizons in administering the POP and undertaking other activities do not appear to be requesting any specific changes to the rules of Chapter 12. The submitters may wish to expand on their submissions at the hearing to clarify desired changes.

The column 'Classification criteria' in the table of rules is simply intended to specify the activity status for the relevant activities addressed in the corresponding rule. To make specific reference to activities such as 'infrastructure and energy development' within this column would not be relevant or necessary.

4.30.3 Recommendation

Reject submissions making reference to the general role of Horizons.
Reject submissions requesting inclusion of specific activities in the 'classification' column of the rules tables.
Accept submission expressing general support for the rules.

4.30.3.1 Recommended changes to provision

None.

4.31 Recommendation Land 31 Chapter 12 Rule 21-1 Vegetation clearance and land disturbance not covered by other rules.

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
ANTHONY DAVID & GAYLENE MAY ATKINS	56	4	Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owner request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.	Reject
RICHARD JOHN & CORAL EVELYN EDWARDS	57	4	Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.	Reject
CLIFTON HOWARD TOMBLESON	58	4	Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.	
PUKEKAHU FARM LTD	60	4	Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.	Reject
DAVID EARLE ROBINS MATTHEWS	65	4	Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed,	Reject

Submitter	Number	Point	Decision Sought	Recommendation
RUSSELL SULLIVAN	94	4	<p>pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p> <p>Add to Activity Column under rule 12.1 :</p> <p>(b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or</p> <p>(c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or</p> <p>(d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p>	Reject
BRUCE EDWARD CULLEY	98	4	<p>Add to Activity Column under rule 12.1 :</p> <p>(b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or</p> <p>(c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or</p> <p>(d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p>	Reject
ALLAN FRANCIS O'NEIL & F J O'NEIL & SONS	113	4	<p>Add to Activity Column under rule 12.1 :</p> <p>(b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or</p> <p>(c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or</p>	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			(d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.	
PETER ALEXANDER ANDERSON	121	4	Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.	Reject
BARY PHILIP LESLIE	137	1	That council minimise its involvement in land use activities to the management of effluent disposal (human & animal).	Reject
HEATHER OLIVER	144	6	Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass,	Reject

Submitter	Number	Point	Decision Sought	Recommendation
WINSTON OLIVER	145	7	<p>any other production weed not included in the Regional Pest Management Strategy.</p> <p>Add to Activity Column under rule 12.1 :</p> <p>(b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or</p> <p>(c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or</p> <p>(d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass,</p> <p>any other production weed not included in the Regional Pest Management Strategy.</p>	Reject
RUAPEHU DISTRICT COUNCIL	151	137	<p>(a) Policy 12-3 be amended to read: "The Regional Council will generally allow vegetation clearance or land disturbance associated with an activity that is important or essential to the well-being of local communities, the Region or a wider area of New Zealand, and recognised under Policy 3-1. Such activities might include ..."</p>	Accept in part
	X 481	202	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
JOHN COLLIER DONALD	154	4	<p>Add to Activity Column under rule 12.1 :</p> <p>(b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or</p> <p>(c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or</p> <p>(d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass,</p> <p>any other production weed not included in the Regional Pest Management</p>	Reject

Submitter	Number	Point	Decision Sought	Recommendation
BARRY & GLENDA WADE	155	4	Strategy. Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.	Reject
COLIN CASELEY	156	4	Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.	Reject
WARRICK & SALLY STREET	157	4	Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to):	Reject

Submitter	Number	Point	Decision Sought	Recommendation
KERRY JOHN THOMPSON	175	4	<p>manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p> <p>Add to Activity Column under rule 12.1 :</p> <p>(b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or</p> <p>(c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or</p> <p>(d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas gorse, any other production weed not included in the Regional Pest Management Strategy.</p>	Reject
SUSTAINABLE WHANGANUI	176	28	We applaud the condition that a whole farm business plan may be a condition of a resource consent for vegetation clearance and land disturbance.	Reject
MOUNTAIN CARROTS N Z LTD	179	8	<p>Amend Rule 12-1 to included cultivation as a permitted activity subject to the following the condition:</p> <p>No cultivation shall occur within 5 metres of the bank of any waterbody identified as an Site of Significance - Aquatic or within 3 metres of the bank of any other permanently flowing river, or any river within a bed width in excess of 2 metres, or any lake or any wetland unless bunding, silt traps, interception drains or other alternative methods to control runoff are installed prior to and maintained during cultivation.</p>	Accept in part
MOUNTAIN CARROTS N Z LTD	179	9	Remove cultivation from the 1000m ³ /y per property threshold in Rule 12-1.	Reject
HORIZONS REGIONAL	182	24	Insert into Rule 12-1 condition (a) after "000m ³ /y per property" the words "or	Accept

Submitter	Number	Point	Decision Sought	Recommendation
COUNCIL			2500m ² /y per property"	
	X 492	199	MINISTER OF CONSERVATION - Support	Accept
	X 505	8	HIMATANGI STATION LTD - Oppose	Reject
	X 533	39	FEDERATED FARMERS OF NEW ZEALAND INC - Oppose	Reject
HORIZONS REGIONAL COUNCIL	182	25	Insert a new sentence at the end of condition (a) "The erosion and sediment control measures shall ensure that stormwater from the site entering surface water does not cause, after reasonable mixing, the percentage change standard for turbidity outlined in schedule D for the receiving waterbody to be breached"	Accept
	X 492	200	MINISTER OF CONSERVATION - Support	Accept
	X 505	9	HIMATANGI STATION LTD - Oppose	Reject
	X 525	42	GENESIS POWER LTD - Oppose	Reject
DONALD ALAN WINDLE	186	4	Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.	Reject
IAN DOUGLAS MC COUBRIE	187	6	Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is	Reject

Submitter	Number	Point	Decision Sought	Recommendation
RODNEY STEWART MC COUBRIE	188	6	<p>considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p> <p>Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p>	Reject
PATRICK WILLIAM CARROLL	189	4	<p>Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p>	Reject
STUART MC NIE	198	6	<p>Add to Activity Column under rule 12.1 :</p>	Reject

Submitter	Number	Point	Decision Sought	Recommendation
ROSEANNE PARKES	217	4	<p>(b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or</p> <p>(c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or</p> <p>(d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p> <p>Add to Activity Column under rule 12.1 :</p> <p>(b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or</p> <p>(c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or</p> <p>(d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p>	Reject
DAVID JOHN WELLS	223	4	<p>Add to Activity Column under rule 12.1 :</p> <p>(b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or</p> <p>(c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or</p> <p>(d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc.,</p>	Reject

Submitter	Number	Point	Decision Sought	Recommendation
DAVID JOHN GREENWOOD	225	8	<p>inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p> <p>Amend Rule 12-1 to included cultivation as a permitted activity subject to the following condition: No cultivation shall occur within 5 metres of the bank of any waterbody identified as an Site of Significance - Aquatic or within 3 metres of the bank of any other permanently flowing river, or any river within a bed width in excess of 2 metres, or any lake or any wetland unless bunding, silt traps, interception drains or other alternative methods to control runoff are installed prior to and maintained during cultivation.</p>	Accept in part
DAVID JOHN GREENWOOD	225	9	Remove cultivation from the 1000m ³ /y per property threshold in Rule 12-1.	Reject
RUAPEHU FEDERATED FARMERS OF NEW ZEALAND INC	246	12	<p>Amend Activity to read "Any vegetation clearance or land disturbance (excluding cultivation)" or Amend the definition for Land Disturbance by adding "(excluding cultivation)" after "surfaces"</p>	Accept in part
RICHARD PORRITT	247	4	<p>Add to Activity Column under rule 12.1 :</p> <p>(b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p>	Reject
MATTHEW BLACK	248	4	<p>Add to Activity Column under rule 12.1 :</p> <p>(b) Any activities carried out under supervision of a qualified Soil</p>	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.	
ANDREW PORRITT	249	4	Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.	Reject
ERNSLAW ONE LTD	269	5	Retain Permitted Activity status for large scale production forestry vegetation clearance and land disturbance as a permitted activity	Accept in part
	X 501	29	ERNSLAW ONE LTD - Support	Accept in part
	X 520	10	N Z FOREST MANAGERS LTD - Support	Accept in part
ERNSLAW ONE LTD	269	6	Amend this rule to include whole forestry block business plans	Reject
	X 501	30	ERNSLAW ONE LTD - Support	Reject
GEOFFREY THOMAS	271	4	Add to Activity Column under rule 12.1 :	Reject

Submitter	Number	Point	Decision Sought	Recommendation
BURTON			(b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.	
FRASER LINDSAY HORROCKS	289	4	Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.	Reject
JOHN COLIN BLACK	292	4	Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc.,	Reject

Submitter	Number	Point	Decision Sought	Recommendation
BLAIR PATRICK SHORTALL	302	4	<p>inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p> <p>Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p>	Reject
JAMES TRUEBRIDGE & SUE YEREX	304	4	<p>inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p> <p>Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p>	Reject
ATIHAI - WHANGANUI INCORPORATION	309	4	<p>inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p> <p>Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm</p>	Reject

Submitter	Number	Point	Decision Sought	Recommendation
RAYONIER N Z LIMITED	310	16	<p>Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p> <p>Retain Permitted Activity status for large scale production forestry vegetation clearance and land disturbance as a permitted activity, but amend this rule to include whole forestry block business plans</p>	Accept in part
	X 501	119	ERNSLAW ONE LTD - Support	Accept in part
KIM YOUNG & SONS LTD	315	8	<p>Amend Rule 12-1 to included cultivation as a permitted activity subject to the following the condition: No cultivation shall occur within 5 metres of the bank of any waterbody identified as an Site of Significance - Aquatic or within 3 metres of the bank of any other permanently flowing river, or any river within a bed width in excess of 2 metres, or any lake or any wetland unless bunding, silt traps, interception drains or other alternative methods to control runoff are installed prior to and maintained during cultivation.</p>	Accept in part
KIM YOUNG & SONS LTD	315	9	Remove cultivation from the 1000m ³ /y per property threshold in Rule 12-1.	Reject
KAPITI GREEN LIMITED	317	7	<p>Amend Rule 12-1 to included cultivation as a permitted activity subject to the following the condition: No cultivation shall occur within 5 metres of the bank of any waterbody identified as an Site of Significance - Aquatic or within 3 metres of the bank of any other permanently flowing river, or any river within a bed width in excess of 2 metres, or any lake or any wetland unless bunding, silt traps, interception drains or other alternative methods to control runoff are installed prior to and maintained during cultivation.</p>	Accept in part
KAPITI GREEN LIMITED	317	8	Remove cultivation from the 1000m ³ /y per property threshold in Rule 12-1.	Reject
DONALD JAMES POLSON	329	4	Add to Activity Column under rule 12.1 :	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			(b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.	
	X 524	4	DEAN GREGORY SPARKES - Support	Reject
NEW ZEALAND DEFENCE FORCE	330	22	1.Amend the concept and definition of "whole farm business plan" to include plans or similar documents providing for sustainable management of land other than farm land.	Reject
NEW ZEALAND DEFENCE FORCE	330	23	2.Amend the concept and definition of "whole farm business plan" to allow for Horizons to endorse and recognise for the purposes of the Proposed One Plan documents prepared by landowners without financial or other assistance from Horizons. (This would reduce the potential resource demands associated with Decision Sought 1 above)	Reject
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	17	Provide for all vegetation clearance and land disturbance associated with plantation forestry as a permitted activity subject to permitted activity standards.	Reject
	X 501	157	ERNSLAW ONE LTD - Support	Reject
	X 520	71	N Z FOREST MANAGERS LTD - Support	Reject
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	18	Provide for all vegetation clearance and land disturbance associated with plantation forestry as a permitted activity subject to compliance with appropriate Industry Codes of Practice	Accept in part
	X 501	158	ERNSLAW ONE LTD - Support	Accept in part
	X 520	72	N Z FOREST MANAGERS LTD - Support	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	24	Notwithstanding the other submissions in relation to this section of the Plan, separate the three Activity criteria (d) to (f) in Rule 12-2 into a separate rule providing for production forestry that meet these criteria as a permitted activity	Reject
	X 501	165	ERNSLAW ONE LTD - Support	Reject
	X 520	78	N Z FOREST MANAGERS LTD - Support	Reject
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	25	Make such other amendments to the other rules in chapter 12 to address the issues raised above.	Reject
	X 501	166	ERNSLAW ONE LTD - Support	Reject
	X 520	79	N Z FOREST MANAGERS LTD - Support	Reject
GEORGE ANTHONY MATTHEWS	333	4	Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc., inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.	Reject
STEWART LESLIE MATTHEWS	342	4	Add to Activity Column under rule 12.1 : (b) Any activities carried out under supervision of a qualified Soil Conservator (or similar person), or (c) Any activity on HEL, where Council is unable to provide a Whole Farm Business Plan within one month of land owners request, or (d) In the case of vegetation clearance the vegetation being cleared is considered a normal farm maintenance pest (such as, but not limited to): manuka or kanuka regrowth, carpet fern, ring fern, etc.,	Reject

Submitter	Number	Point	Decision Sought	Recommendation
RANGITIKEI DISTRICT COUNCIL	346	69	<p>inkweed, pampas grass, any other production weed not included in the Regional Pest Management Strategy.</p> <p>Amend Rule 12-1 to read: Any vegetation clearance* or land disturbance* pursuant to s 9 RMA that is not specifically regulated by any other rule in this Plan.</p> <p>For the avoidance of doubt, this rule includes vegetation clearance* and land disturbance* that is carried out in accordance with a whole farm business plan* and vegetation clearance and land disturbance undertaken by or on behalf of, Territorial Authorities for the purpose of managing district roading networks.</p>	Reject
	X 481	774	PALMERSTON NORTH CITY COUNCIL - Support	Reject
WOODHAVEN GARDENS LTD	347	8	<p>Amend Rule 12-1 to included cultivation as a permitted activity subject to the following the condition: No cultivation shall occur within 5 metres of the bank of any waterbody identified as an Site of Significance - Aquatic or within 3 metres of the bank of any other permanently flowing river, or any river within a bed width in excess of 2 metres, or any lake or any wetland unless bunding, silt traps, interception drains or other alternative methods to control runoff are installed prior to and maintained during cultivation.</p>	Accept in part
WOODHAVEN GARDENS LTD	347	9	Remove cultivation from the 1000m ³ /y per property threshold in Rule 12-1.	Reject
DAVID YOUNG	348	8	<p>Amend Rule 12-1 to included cultivation as a permitted activity subject to the following the condition: No cultivation shall occur within 5 metres of the bank of any waterbody identified as an Site of Significance - Aquatic or within 3 metres of the bank of any other permanently flowing river, or any river within a bed width in excess of 2 metres, or any lake or any wetland unless bunding, silt traps, interception drains or other alternative methods to control runoff are installed prior to and maintained during cultivation.</p>	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
DAVID YOUNG	348	9	Remove cultivation from the 1000m ³ /y per property threshold in Rule 12-1.	Reject
ALMADALE PRODUCE LTD	350	8	Amend Rule 12-1 to included cultivation as a permitted activity subject to the following condition: No cultivation shall occur within 5 metres of the bank of any waterbody identified as an Site of Significance - Aquatic or within 3 metres of the bank of any other permanently flowing river, or any river within a bed width in excess of 2 metres, or any lake or any wetland unless bunding, silt traps, interception drains or other alternative methods to control runoff are installed prior to and maintained during cultivation.	Accept in part
ALMADALE PRODUCE LTD	350	9	Remove cultivation from the 1000m ³ /y per property threshold in Rule 12-1.	Reject
NEW ZEALAND HISTORIC PLACES TRUST - CENTRAL REGION	353	16	References in the proposed One Plan that require applicants to obtain authority from the NZHPT for an archaeological site, be reworded to the following effect - any archaeological site, waahi tapu or koiwi remains as identified in the regional plan, any district plan, in the New Zealand Archaeological Associations Site Recording Scheme, or by the Historic Places Trust except where Historic Places Trust approval in consultation with iwi for waahi tapu or koiwi remains has been obtained.	Accept
JOHN BATLEY	355	2	Vegetation and land clearance regulation take no account of the size of the property and the areas/volumes are incredibly low, as is the water use.	Accept in part
ENVIRONMENT NETWORK MANAWATU	356	41	ENM generally support this rule, however if the vegetation clearance or land disturbance is undertaken "in accordance with a whole farm business plan" will this plan have operative sections to take the place of the performance standards listed? ENM appreciate the desire to have incentives to make these voluntary plans work, but are still concerned that without standards how the effect of the activity will actually be controlled.	Accept in part
ENVIRONMENT NETWORK MANAWATU	356	42	ENM generally support this rule, however there is a lack of clarity about what "effective erosion and sediment control measures" are.	Accept in part
HORTICULTURE NEW	357	111	Decisions Sought:	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
ZEALAND			<p>Amend Rule 12-1 to included cultivation as a permitted activity subject to the following the condition: No cultivation shall occur within 5 metres of the bank of any waterbody identified as an Site of Significance - Aquatic or within 3 metres of the bank of any other permanently flowing river, or any river within a bed width in excess of 2 metres, or any lake or any wetland unless bunding, silt traps, interception drains or other alternative methods to control runoff are installed prior to and maintained during cultivation. Remove cultivation from the 1000m³/y per property threshold in Rule 12-1. Amend the definition of vegetation clearance so it is clear that harvesting of horticulture crops is not classed as vegetation clearance.</p>	
	X 533	40	FEDERATED FARMERS OF NEW ZEALAND INC - Support	Accept in part
MERIDIAN ENERGY LIMITED	363	143	<p>Meridian requests that Rule 12-1 is amended as follows or similar: Provide for renewable energy development as a permitted activity as requested in Meridian's primary submission to Chapter 12. [363/135] Any consequential amendments necessary to give effect to this submission</p>	Reject
	X 492	201	MINISTER OF CONSERVATION - Oppose	Accept
	X 511	397	TRUST POWER LIMITED - Support	Reject
MERIDIAN ENERGY LIMITED	363	144	<p>Meridian requests that Rule 12-1 is amended as follows or similar: Amend text under the heading "Activity" as follows: For the avoidance of doubt, this rule includes vegetation clearance and land disturbance that is carried out in accordance with a whole farm business plan or a renewable energy development plan. Any consequential amendments necessary to give effect to this submission</p>	Reject
	X 525	70	GENESIS POWER LTD - Support	Reject
ARBOR MANAGEMENT LIMITED	391	10	Retain Permitted Activity status for large scale production forestry vegetation clearance	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
	X 501	205	ERNSLAW ONE LTD - Support	Accept in part
	X 520	107	N Z FOREST MANAGERS LTD - Support	Accept in part
ARBOR MANAGEMENT LIMITED	391	11	Retain Permitted Activity status for land disturbance	Accept in part
	X 501	206	ERNSLAW ONE LTD - Support	Accept in part
	X 520	108	N Z FOREST MANAGERS LTD - Support	Accept in part
ARBOR MANAGEMENT LIMITED	391	12	amend this rule to include whole forestry block business plans.	Reject
	X 501	207	ERNSLAW ONE LTD - Support	Reject
HOROWHENUA DISTRICT GROWERS ASSOCIATION	392	21	Amend Rule 12-1 to included cultivation as a permitted activity subject to the following the condition: No cultivation shall occur within 5 metres of the bank of any waterbody identified as an Site of Significance - Aquatic or within 3 metres of the bank of any other permanently flowing river, or any river within a bed width in excess of 2 metres, or any lake or any wetland unless bunding, silt traps, interception drains or other alternative methods to control runoff are installed prior to and maintained during cultivation.	Accept in part
HOROWHENUA DISTRICT GROWERS ASSOCIATION	392	22	Remove cultivation from the 1000m3/y per property threshold in Rule 12-1.	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	131	Delete Rule 12- 1 or in the alternative,	Reject
	X 505	14	HIMATANGI STATION LTD - Support	Reject
	X 511	398	TRUST POWER LIMITED - Support	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	132	Amend 12-1 as follows: Reword 12-1 paragraph two as follows: "for the avoidance of doubt, this rule includes excludes vegetation clearance and land disturbance that is carried out in accordance with a WFBP or land	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			management practices that will reduce the effects of accelerated erosion" (or words to that effect)	
	X 505	15	HIMATANGI STATION LTD - Support	Reject
	X 511	399	TRUST POWER LIMITED - Support	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	133	Delete "per property "throughout the plan and replace with "per hectare". Consequential amendment through this chapter and the Plan	Reject
	X 502	123	NEW ZEALAND DEFENCE FORCE - Support	Reject
	X 505	16	HIMATANGI STATION LTD - Support	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	134	Add new Rule 12-1-1 Cultivation: Permitted Activity subject to the following condition: (a) No cultivation shall occur within 5 metres of the bank of any waterbody identified as an Site of Significance - Aquatic or within 3 metres of the bank of any other permanently flowing river, or any river within a bed width in excess of 2 metres, or any lake or any wetland unless bunding, silt traps, interception drains or other alternative methods to control runoff are installed prior to and maintained during cultivation.	Accept in part
	X 505	17	HIMATANGI STATION LTD - Support	Accept in part
MANAWATU BRANCH OF N Z GREEN PARTY	433	53	In the table of rules: Add under Conditions / Standards / Terms a new paragraph (d) setting out standards for vegetation clearance for Whole Farm Business Plans in order to give effect to Policy 5-3. [Note: Policy 5-3: (page 5-6) on regulation of vegetation clearance and land disturbance on Highly Erodible Land]	Reject
LOCAL FORESTRY INDUSTRY GROUP	435	6	We would wish to see this slope angle increased to 24 degrees	Reject
	X 501	260	ERNSLAW ONE LTD - Support	Reject
	X 520	140	N Z FOREST MANAGERS LTD - Support	Reject

Submitter	Number	Point	Decision Sought	Recommendation
PESCINI BROTHERS	438	22	Amend Rule 12-1 to included cultivation as a permitted activity subject to the following the condition: No cultivation shall occur within 5 metres of the bank of any waterbody identified as an Site of Significance - Aquatic or within 3 metres of the bank of any other permanently flowing river, or any river within a bed width in excess of 2 metres, or any lake or any wetland unless bunding, silt traps, interception drains or other alternative methods to control runoff are installed prior to and maintained during cultivation.	Accept in part
PESCINI BROTHERS	438	23	Remove cultivation from the 1000m ³ /y per property threshold in Rule 12-1.	Reject
B S YOUNG LTD	449	22	Amend Rule 12-1 to included cultivation as a permitted activity subject to the following the condition: No cultivation shall occur within 5 metres of the bank of any waterbody identified as an Site of Significance - Aquatic or within 3 metres of the bank of any other permanently flowing river, or any river within a bed width in excess of 2 metres, or any lake or any wetland unless bunding, silt traps, interception drains or other alternative methods to control runoff are installed prior to and maintained during cultivation.	Accept in part
B S YOUNG LTD	449	23	Remove cultivation from the 1000m ³ /y per property threshold in Rule 12-1.	Reject
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	98	Support with a caveat that whole farm business plans are consistent with the policy and objectives of the One Plan and that they contain operative sections that are equivalent to the performance standards listed. Define what is meant by effective erosion control and sediment control measures	Accept in part
	X 505	12	HIMATANGI STATION LTD - Oppose	Reject
COLIN BOND	470	5	No decision requested, However submitter notes: Rule 12.1 - I support the comment from policy 4.4 and Policy 4.2 (iii) proposing "developing a code of practice whereby resource users and contractors have clear guidelines in the event rua koiwi or waahi tapu are discovered".	Accept in part

4.31.1 Summarise submission points

- (a) Amend definition of WFBPs to include other activities.
- (b) Include new conditions controlling vegetation clearance associated with WFBPs.
- (c) Include cultivation as a permitted activity or amend the definition of land disturbance to exclude cultivation.
- (d) Add an area condition.
- (e) Amend wording of condition relating to discovery of archaeological material.
- (f) Define what is meant by 'effective erosion and sediment control'.
- (g) Add reference to other land management practices that will reduce effects of accelerated erosion as being permitted activities.
- (h) Enable plantation forestry as a permitted activity.
- (i) Amend definition of vegetation clearance to exclude clearance of pasture weeds such as manuka, kanuka, carpet fern, inkweed, etc.
- (j) Add new permitted activity - activity undertaken under supervisions of a soil conservator or where a WFBP cannot be prepared within one month of it being requested.
- (k) Replace 'per property' with 'per hectare'.
- (l) Amend rule to provide for renewable energy development as a permitted activity.
- (m) General opposition to the rule.
- (n) General support for the rule.

4.31.2 Evaluation

Submitters requests to amend the definition of WFBPs to include other activities has been previously discussed. Currently other activities are not dealt with under WFBP method, therefore Horizons cannot amend the definition in the POP to include other activities. Where amendments are made to WFBPs in the future to enable these activities to be included, changes to the rule can be made.

Include new conditions controlling vegetation clearance associated with WFBPs. WFBPs are voluntary and therefore it is not appropriate to include rules within the POP that constrain their implementation. The vegetation clearance and land disturbance rules prevent any of those activities not covered by a WFBP from occurring without the necessary controls.

Submitters request to include cultivation as a permitted activity or amend the definition of land disturbance to exclude cultivation. Cultivation on Hillcountry HEL is unlikely to occur due to the types of land uses that generally occur in those locations (pastoral farming, forestry). Therefore it is not necessary to include this as a permitted activity in those areas. Cultivation on Coastal HEL is more likely to occur, in which case the land management issue is more a matter of controlling wind erosion rather than discharges of sediment into waterways. I therefore consider that it is appropriate to enable land disturbance associated with cultivation in closer

proximity to rivers, lakes and wetlands than is currently proposed in the rule. While a lesser setback from waterbodies for cultivation is considered to be appropriate, it is important that there remains some level of protection in the form of a physical setback as well as the requirements of Rule 12-1 in terms of sediment control and management. Therefore it would not be appropriate to exclude cultivation from the definition of land disturbance as this would remove the onus to comply with the standards in Rule 12-1 (Rule 12-1 permits 'vegetation clearance and land disturbance' activities so any activities that are excluded from the definition of land disturbance would not be captured by this rule).

To give effect to my recommendation to enable cultivation closer to waterbodies, I propose a new sub clause in Rule 12-5(b) to enable vegetation clearance and land disturbance activities within 5 metres of rivers, lakes and natural wetlands where the ground slope is generally flat (between 0 degrees and 5 degrees). Flatter land is less likely to result in direct run-off into water bodies and is therefore considered to be an appropriate standard to minimise the effects of activities on the environment.

Currently Condition (a) of the rule only includes a limit on volume of land disturbance beyond which erosion and sediment control is required. In many cases, that volume may not be exceeded but a significant area of soil is affected (eg. the construction of a road or track) with a resulting significant potential for erosion. I therefore agree with submitters that it is appropriate to include an area trigger in the condition also.

Submitters request amendment to the wording of condition (b) which refers to archaeological material. It is requested that reference to consultation with iwi in the case of waahi tapu or koiwi occurs as part of the Historic Places Trust approval. I agree that this would be the normal course of events in obtaining approval from the Trust and it is therefore appropriate to make reference to this in the condition.

Condition (a) currently refers to 'effective erosion and sediment control'. This is not clear in terms of what 'effective' means. I therefore agree with submitters that it is necessary to add a sentence to clarify what 'effective' means in the context of this condition.

The description of the Activity in rule 12-1 includes a clarification note referring to activities carried out in accordance with a WFBP. Submitters request that this note be extended to refer to 'land management practices that will reduce the effects of accelerated erosion'. I consider that this does not provide any clarity to the rule. Activities that are excluded from other rules in the chapter are specifically identified (where relevant) as being permitted activities pursuant to Rule 12-1. I consider that it is therefore not necessary to add a general statement about other land management practices.

Vegetation clearance associated with production forestry has the potential to cause significant adverse effects in terms of accelerated erosion where the activity is not carefully managed. The POP currently includes provision for production forestry activities as permitted activities where the activities are accredited by the Forestry Stewardship Council programme. The policies of Chapter 5 – Land and Chapter 12 make it clear that Horizons supports activities with appropriate codes of practice in place as

permitted activities. As previously discussed, the forestry industry has not to date provided a code of practice that meets the requirements of the POP and therefore it is not appropriate to provide for these activities as permitted activities.

Agricultural land uses particularly are affected by a range of 'weeds' that have the potential to inhibit pasture production. Management of pasture requires that these weed species are cleared by means other than grazing (the species are generally unpalatable to stock). These species are generally low species such as thistle and fern and are usually cleared regularly to maintain maximum pasture. These species tend to provide little or no greater protection from accelerated erosion than pasture and therefore it is not considered that to remove these species is likely to result in an increase in accelerated erosion. To this end, I agree with submitters that request that a change is made to the definition of 'vegetation clearance' to exclude such pasture pest species.

I propose that the definition of vegetation clearance includes an additional exception:

The control of other plants not included in the Regional Pest Plant Management Strategy where those plants are less than 2 years old and have established as a result of natural dispersion.

Submitters that seek to add an additional permitted activity to enable vegetation clearance and land disturbance to occur under the supervision of a soil conservator or if a requested WFBP has not been prepared within one month of being requested, appear to be responding to concerns about the speed with which resource consents will be processed. This issue has been discussed above and will be addressed by amending the activity status for such activities to restricted discretionary to aid a fast-track consent processing system. Where expert staff are able to assess and issue resource consents for works on site and in a short timeframe, this minimises the delay for landowners in situations where a WFBP has not been prepared. I therefore do not consider it necessary to include a new permitted activity rule to address such activities.

As previously discussed, the 'per property' trigger for vegetation clearance and land disturbance areas and volumes is a reflection of the intention to consider any significant amount of work on HEL. The intention of the condition is to provide a trigger to engage the expertise of somebody experience in management of activities to minimise accelerated erosion. In reality, whether the trigger is per property or per hectare, the intention is still the same – the limit has been put in place to trigger the input of expertise.

As with forestry activities, the development of renewable energy generation facilities has the potential to cause significant effects due to accelerated erosion if the activity is not carefully managed. Where submitters involved in developing energy generation facilities prepare appropriate codes of practice or industry standards to a level that makes them acceptable in terms of achieving the outcomes of the POP, those activities can be included in the POP as permitted activities. I am not currently aware of such codes of practice that would enable a permitted activity to be inserted at this time, however the submitters may wish to present evidence on this matter at the hearing.

Submitters expressing general opposition to the rule do not appear to seek any particular relief and provide no reasoning for their opposition. I cannot therefore consider recommending any changes in response to these submissions.

4.31.3 Recommendation

Reject submissions requesting to amend definition of WFBPs to include other activities.

Reject submissions requesting to include new conditions controlling vegetation clearance associated with WFBPs.

Accept in part submissions requesting to include cultivation as a permitted activity or amend the definition of land disturbance to exclude cultivation.

Accept conditions requesting the addition of an area limit to condition (a).

Accept submissions requesting to amend wording of condition relating to discovery of archaeological material.

Accept in part submissions requesting to define what is meant by 'effective erosion and sediment control'.

Reject submissions requesting to add reference to other land management practices that will reduce effects of accelerated erosion as being permitted activities.

Reject submissions requesting to further enable plantation forestry as a permitted activity.

Accept in part submissions requesting to amend definition of vegetation clearance to exclude clearance of pasture weeds such as manuka, kanuka, carpet fern, inkweed, etc.

Reject submissions requesting to add new permitted activity - activity undertaken under supervisions of a soil conservator or where a WFBP cannot be prepared within one month of it being requested.

Reject submissions requesting to replace 'per property' with 'per hectare'.

Reject submissions requesting to amend rule to provide for renewable energy development as a permitted activity.

Reject submissions expressing general opposition to the rule.

Accept submissions expressing general support for the rule.

4.31.3.1 Recommended changes to provision

Add the words 'or 2500m²/y per property' to condition (a) after '1000m³/y per property'.

Add the following sentence to condition (a) after 'completion of works'. '*The erosion and sediment control measures shall ensure that stormwater from the site entering surface water does not cause, after reasonable mixing, the percentage change standard for turbidity outlined in Schedule D for the receiving waterbody to be breached.*'

Add the words 'in consultation with iwi for waahi tapu or koiwi remains' after 'Historic Places Trust approval' in condition (b).

Add a new exclusion point to the definition of 'Vegetation clearance: The control of other plants not included in the Regional Pest Plant Management Strategy where those plants are less than 2 years old and have established as a result of natural dispersion.

4.32 Recommendation Land 32 Chapter 12 Rule 12-2 Production forestry

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
POWERCO LIMITED	272	33	S1- Rule 12-2 to have an additional exemption to read "(g) carried out for the purpose of maintaining an infrastructure corridor to comply with the provisions of the Electricity (Hazards from Trees) Regulations 2003."	Accept in part
HOROWHENUA DISTRICT COUNCIL	280	65	[Matters referred to in Submission as follows Some rules in Section 12 of the Plan do not provide certainty as to activity status and therefore it may be difficult for a landowner or a district planner administering the land use provisions of a District Plan to discern whether or not a consent is required and, if required, what type of consent.] Clarify all the above matters [referring to 12-2] and provide certainty of interpretation and activity status for land users and Plan users seeking to interpret and apply the rules in Section 12 of the Plan.	Reject
	X 481	426	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 495	230	RUAPEHU DISTRICT COUNCIL - Support	Reject
WANGANUI DISTRICT COUNCIL	291	36	[Matters referred to in Submission as follows Some rules in Section 12 of the Plan do not provide certainty as to activity status and therefore it may be difficult for a landowner or a district planner administering the land use provisions of a District Plan to discern whether or not a consent is required and, if required, what type of consent.] - Withdraw the whole plan; or - Clarify all the above matters [referring to 12-2] and provide certainty of interpretation and activity status for land users and Plan users seeking to interpret and apply the rules in Section 12 of the Plan.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			- Consider other forms of accreditation.	
	X 481	496	PALMERSTON NORTH CITY COUNCIL - Support	Reject
GORDON GEORGE KUGGELEIJN	300	5	No specific decision requested but raises existing use rights in relation to logging of production forests. Can the application of when a consent is required be clearly defined please? (for forestry harvest)	Reject
	X 501	79	ERNSLAW ONE LTD - Support	Reject
P F OLSEN LIMITED	305	14	1.Widen the base of approved third party audit and certification vehicles open to be used to achieve permitted activity status for forestry companies.	Reject
	X 501	86	ERNSLAW ONE LTD - Support	Reject
	X 520	26	N Z FOREST MANAGERS LTD - Support	Reject
P F OLSEN LIMITED	305	15	<p>2. Make provision within the plan to utilise the Forestry Code with in a yet-to-be negotiated framework such as that established below.</p> <p>Mechanism proposed for permitted use under Rule 12.2</p> <p>1. Rule 12.2 should make reference to a schedule A of approved operators, who had made application and had approved by Council, their recognised environmental management certifications and processes. These should include FSC, PEFC, ISO14001 or other forest environmental management systems recognised under the PEFC scheme. Approval should relate to the certified status of the controller of operations rather than a particular patch of land.</p> <p>2. For those, normally smaller to medium sized forest managers, there should be a schedule B where applicant may apply to have their performance & systems effectively assessed and approved by Council, and subject either to periodic audit by either Council Consents officers or a registered Forestry Consultant or other qualified party recognised by Council, be able to operate on a permitted use basis. In our view the basis for people operating at this level should be that they are able to demonstrate the formation of a basic EMS incorporating the following elements;</p> <p>-Reference to and compliance with the NZ Environmental Code of Forestry</p>	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			<p>Practice (the Code). -Compliance with the NZ Forest Accord. -Have developed a in association with the Code, a formal incident reporting and management system including public complaints -Have developed in association with the Code a formal environmental monitoring system.</p> <p>3. For those undertaking small one off operations in the region and for whom the cost and effort of either of the options above, the obtaining of resource consents per the plan would remain the same.</p> <p>4. Non - performance in the case of option 1 & 2, defined in terms of loss of Certification in option 1 or repeated auditor/consents officer reported non-compliance in terms of option 2.</p>	
	X 501	87	ERNSLAW ONE LTD - Support	Reject
	X 520	27	N Z FOREST MANAGERS LTD - Support	Reject
RAYONIER N Z LIMITED	310	17	<p>Rule 12-2(d) Remove all reference to FSC and any other specifically named commercial accreditation system. Insert wording. Where production forestry can show evidence of recognised third party environmental accreditation or adherence to the New Zealand Environmental Code of Practice for Plantation Forestry V1 they will retain permitted activity status. Or words to like effect.</p>	Reject
	X 501	120	ERNSLAW ONE LTD - Support	Reject
	X 520	50	N Z FOREST MANAGERS LTD - Support	Reject
RUAPEHU DISTRICT COUNCIL	151	145	That Rule 12.2 be retained and extended to permit vegetation clearance and land disturbance undertaken by or on behalf of, TAs for the purpose of managing district roading networks and other infrastructure.	Accept in part
	X 481	210	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
TARARUA DISTRICT	172	62	[Matters referred to in Submission as follows	Reject

Submitter	Number	Point	Decision Sought	Recommendation
COUNCIL			<p>Some rules in Section 12 of the Plan do not provide certainty as to activity status and therefore it may be difficult for a landowner or a district planner administering the land use provisions of a District Plan to discern whether or not a consent is required and, if required, what type of consent.]</p> <p>- Withdraw the whole plan; or clarify - all the above matters [referring to Rule 12-2] and provide certainty of interpretation and activity status for land users and Plan users seeking to interpret and apply the rules in Section 12 of the Plan.</p>	
	X 481	333	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 495	228	RUAPEHU DISTRICT COUNCIL - Support	Reject
HORIZONS REGIONAL COUNCIL	182	26	Amend Rule 12-2 to remove Activity sub clause (e) which refers to slopes less than 20 degrees.	Accept
	X 533	41	FEDERATED FARMERS OF NEW ZEALAND INC - Support	Accept
RUAPEHU FEDERATED FARMERS OF NEW ZEALAND INC	246	13	<p>Delete Activity (a), (b) and (c)</p> <p>Amend Activity (d) to read "in compliance with the Forestry Environmental Code of Practice"</p> <p>Amend Activity (e) to read "on land that has an existing slope of less than 30 degrees."</p> <p>Delete all reference to "per property" and replace with "per hectare" or something similar.</p> <p>Council needs a robust process for assessing environmental benefit of industry codes of practice before giving them undue recognition.</p>	Reject
	X 501	18	ERNSLAW ONE LTD - Support	Reject
ERNSLAW ONE LTD	269	10	Have developed in association with the Code, a formal incident reporting and management system including public complaints	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 501	23	ERNSLAW ONE LTD - Support	Reject
	X 520	14	N Z FOREST MANAGERS LTD - Support	Reject
ERNSLAW ONE LTD	269	11	The decision that Ernslaw One seeks from the Council is that Council limits its control to: 1. measures to maintain slope stability in relation to the harvesting of plantation forests	Accept in part
	X 501	24	ERNSLAW ONE LTD - Support	Accept in part
ERNSLAW ONE LTD	269	12	The decision that Ernslaw One seeks from the Council is that Council limits its control to: 2. control of sediment run-off	Accept in part
	X 501	25	ERNSLAW ONE LTD - Support	Accept in part
	X 525	17	GENESIS POWER LTD - Oppose	Accept in part
ERNSLAW ONE LTD	269	7	Remove reference to FSC as criteria for permitted activity status	Reject
	X 501	31	ERNSLAW ONE LTD - Support	Reject
	X 520	11	N Z FOREST MANAGERS LTD - Support	Reject
ERNSLAW ONE LTD	269	8	Recognition and endorsement by Horizons of the New Zealand Environmental Code of Practice for Plantation Forestry V1 developed by the New Zealand Forest Owners Association.	Reject
	X 484	25	MINISTRY OF AGRICULTURE & FORESTRY - Support	Withdrawn
	X 501	32	ERNSLAW ONE LTD - Support	Reject
	X 520	12	N Z FOREST MANAGERS LTD - Support	Reject
ERNSLAW ONE LTD	269	9	Inclusion of the New Zealand Environmental Code of Practice for Plantation Forestry V1 in the Proposed One Plan as a non regulatory method for production forestry to remain a permitted activity.	Reject
	X 501	33	ERNSLAW ONE LTD - Support	Reject
	X 520	13	N Z FOREST MANAGERS LTD - Support	Reject

Submitter	Number	Point	Decision Sought	Recommendation
N Z FOREST MANAGERS LTD	319	3	NZFM submits that in order to successfully acknowledge all environmentally well performing forestry companies within the Horizons MW region, the exclusion clause in Rule 12-2 should be available to all companies successfully operating under the NZ Environmental Code of Practice for Plantation Forestry (NZE COP), rather than only those who are FSC certified. As such NZFM submits that the NZE COP should replace the Forest Stewardship Council Programme in Rule 12-2 (d).	Reject
	X 501	138	ERNSLAW ONE LTD - Support	Reject
N Z FOREST MANAGERS LTD	319	4	Such a system could group companies by: (i) Forest companies with third party environmental certification (classed as an approved operator") and currently operating under the NZE COP. These companies would be given Permitted Activity" status and would not be monitored. (ii) Companies without third party environmental certification but proven compliance with the NZE COP. These companies would be given Permitted Activity" status after a statutory operating period without serious non-compliance issues. (iii) All other companies, i.e. those that do not show commitment to the NZE COP. These companies operations would be classified as Controlled" under Rule 12-2.	Reject
	X 501	139	ERNSLAW ONE LTD - Support	Reject
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	19	Without limiting the relief sought in submission 331/17 and 331/18, if criteria are to be retained to achieve permitted status amend the Activity descriptions and Conditions/Standards/Terms in rule 12-2 to give effect to the issues raised above including the following changes:: (a) Amend Activity Criteria (d) to increase the range of criteria for achieving	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			permitted status as set out in the reasons above;	
	X 501	159	ERNSLAW ONE LTD - Support	Reject
	X 520	73	N Z FOREST MANAGERS LTD - Support	Reject
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	20	Without limiting the relief sought in submission 331/17 and 331/18, if criteria are to be retained to achieve permitted status amend the Activity descriptions and Conditions/Standards/Terms in rule 12-2 to give effect to the issues raised above including the following changes:: (a)Amend Activity Criteria (e) to clarify that: (i)it applies throughout the region (not just on Highly Erodible Land) and (ii)provide for a minimum threshold of the area of land over 20o before an operation becomes controlled; and (iii)provide that the controlled status only applies to the area of the operation over 20 o.	Reject
	X 501	161	ERNSLAW ONE LTD - Support	Reject
	X 520	74	N Z FOREST MANAGERS LTD - Support	Reject
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	21	Without limiting the relief sought in submission 331/17 and 331/18, if criteria are to be retained to achieve permitted status amend the Activity descriptions and Conditions/Standards/Terms in rule 12-2 to give effect to the issues raised above including the following changes:: (a)Incorporate the Conditions / Standards /Terms as permitted activity standards	Reject
	X 501	162	ERNSLAW ONE LTD - Support	Reject
	X 520	75	N Z FOREST MANAGERS LTD - Support	Reject
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	22	Without limiting the relief sought in submission 331/17 and 331/18, if criteria are to be retained to achieve permitted status amend the Activity descriptions and Conditions/Standards/Terms in rule 12-2 to give effect to the issues raised above including the following changes:: (a)Delete Condition/Standard/Term (a);	Reject
	X 501	163	ERNSLAW ONE LTD - Support	Reject
	X 520	76	N Z FOREST MANAGERS LTD - Support	Reject

Submitter	Number	Point	Decision Sought	Recommendation
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	23	In addition further changes to Rule 12-2 may be required to address the relief sought in relation to Chapter 13 discharges as identified further in HFM NZ submission.	
	X 501	164	ERNSLAW ONE LTD - Support	Reject
	X 520	77	N Z FOREST MANAGERS LTD - Support	Reject
TRANSIT NEW ZEALAND	336	28	Add an additional control under this rule be added to ensure that production forestry is not established in any location adjacent to rivers or streams which are prone to flooding, landslide or lahars and where such forestry could be at risk of being washed down any river or stream.	Reject
	X 501	193	ERNSLAW ONE LTD - Oppose	Accept
	X 520	94	N Z FOREST MANAGERS LTD - Oppose	Accept
MANAWATU DISTRICT COUNCIL	340	84	[Matters referred to in Submission as follows Some rules in Section 12 of the Plan do not provide certainty as to activity status and therefore it may be difficult for a landowner or a district planner administering the land use provisions of a District Plan to discern whether or not a consent is required and, if required, what type of consent.] Clarify all the above matters [relating to Rule 12-2] and provide certainty of interpretation and activity status for land users and Plan users seeking to interpret and apply the rules in Section 12 of the Plan.	Reject
	X 481	640	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 495	232	RUAPEHU DISTRICT COUNCIL - Support	Reject
RANGITIKEI DISTRICT COUNCIL	346	62	[Matters referred to in Submission as follows Some rules in Section 12 of the Plan do not provide certainty as to activity status and therefore it may be difficult for a landowner or a district planner administering the land use provisions of a District Plan to discern whether or not a consent is required and, if required, what type of consent.] Clarify all the above matters [referring to Rule 12-2] and provide certainty of interpretation and activity status for land users and Plan users seeking to interpret and apply the rules in Section 12 of the Plan.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 481	767	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 495	229	RUAPEHU DISTRICT COUNCIL - Support	Reject
RANGITIKEI DISTRICT COUNCIL	346	70	Retain Rule 12-2 and extend it to permit vegetation clearance and land disturbance undertaken by or on behalf of, Territorial Authorities for the purpose of managing district roading networks.	Accept in part
	X 481	775	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 495	231	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
NEW ZEALAND HISTORIC PLACES TRUST - CENTRAL REGION	353	17	References in the proposed One Plan that require applicants to obtain authority from the NZHPT for an archaeological site, be reworded to the following effect - any archaeological site, waahi tapu or koiwi remains as identified in the regional plan, any district plan, in the New Zealand Archaeological Associations Site Recording Scheme, or by the Historic Places Trust except where Historic Places Trust approval in consultation with iwi for waahi tapu or koiwi remains has been obtained.	Accept
GORDON MCKELLAR	354	2	Change the section (b) of this rule (activity) to as below: (b) in the case of hill country highly erodible land* the affected area is more than 33.3% of the property* area per year.	Reject
ENVIRONMENT NETWORK MANAWATU	356	43	A diagram should be included to illustrate 12-2(a)(i) & (ii) as measurement of land slope could be interpreted in different ways	Accept in part
MINISTER OF CONSERVATION	372	134	Amend criterion (i) to read 'revegetation requirements, including areas to be permanently retired for erosion or sediment control purposes'.	Reject
	X 501	198	ERNSLAW ONE LTD - Oppose	Accept
	X 520	98	N Z FOREST MANAGERS LTD - Oppose	Accept
MINISTRY OF AGRICULTURE & FORESTRY	373	44	Retain Rule 12-2.	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
	X 492	203	MINISTER OF CONSERVATION - Support	Accept
	X 495	227	RUAPEHU DISTRICT COUNCIL - Support	Accept
NEW ZEALAND PINE MANAGEMENT LIMITED	390	1	No decision requested, however submitter notes: submitter is not supportive of Production Forestry being a controlled (rather than permitted) activity	Reject
	X 501	203	ERNSLAW ONE LTD - Support	Reject
	X 520	100	N Z FOREST MANAGERS LTD - Support	Reject
ARBOR MANAGEMENT LIMITED	391	13	Remove reference to FSC as criteria for permitted activity status.	Reject
	X 501	208	ERNSLAW ONE LTD - Support	Reject
	X 520	109	N Z FOREST MANAGERS LTD - Support	Reject
ARBOR MANAGEMENT LIMITED	391	14	Recognition and endorsement by Horizons of the New Zealand Environmental Code of Practice for Plantation Forestry V1 developed by the New Zealand Forest Owners Association.	Reject
	X 501	209	ERNSLAW ONE LTD - Support	Reject
	X 520	110	N Z FOREST MANAGERS LTD - Support	Reject
ARBOR MANAGEMENT LIMITED	391	15	Inclusion of the New Zealand Environmental Code of Practice for Plantation Forestry V1 in the Proposed One Plan as a non regulatory method for production forestry to remain a permitted activity.	Reject
	X 501	210	ERNSLAW ONE LTD - Support	Reject
	X 520	111	N Z FOREST MANAGERS LTD - Support	Reject
ARBOR MANAGEMENT LIMITED	391	16	Have developed in association with the Code a formal incident reporting and management system including public complaints.	Reject
	X 501	211	ERNSLAW ONE LTD - Support	Reject
ARBOR MANAGEMENT LIMITED	391	17	The decision that Arbor Management seeks from the Council is that Council limits its control: 1. measures to maintain slope stability in relation to the harvesting of	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			plantation forests and; 2. control of sediment run-off Chapter 12 Rule 12.2 (d): Production Forestry	
	X 501	212	ERNSLAW ONE LTD - Support	Reject
ARBOR MANAGEMENT LIMITED	391	3	Plantation forestry activities are provided for as Permitted Activities subject to performance standards... without restriction based on the size of the activity, landscape setting, slope angle, catchment area etc or other arbitrary restrictions.	Accept in part
	X 492	202	MINISTER OF CONSERVATION - Oppose	Reject
	X 501	214	ERNSLAW ONE LTD - Support	Accept in part
	X 520	103	N Z FOREST MANAGERS LTD - Support	Accept in part
ARBOR MANAGEMENT LIMITED	391	4	We submit that this approach is consistent with Council's Policy 12-2 Recognition of Industry Standards.	Accept in part
	X 501	215	ERNSLAW ONE LTD - Support	Accept in part
	X 520	104	N Z FOREST MANAGERS LTD - Support	Accept in part
POHANGINA VALLEY COMMUNITY COMMITTEE	408	1	The creation, management and felling of production forestry and wood lots should require some form of consent and monitoring so as to keep council abreast of potential costly risks to infrastructure - particularly bridges, roads, soil erosion, changes to waterway channels, and potential flood risks.	Accept in part
	X 501	222	ERNSLAW ONE LTD - Oppose	Reject
	X 520	113	N Z FOREST MANAGERS LTD - Oppose	Reject
NEW ZEALAND INSTITUTE OF FORESTRY	419	15	NZIF submits that the Council should: Widen the base of approved third party audit and certification vehicles open to be used to achieve permitted activity status for forestry companies; Make provision within the plan to utilise the Forestry Code within an as yet to be negotiated framework such as that suggested below.	Reject
	X 501	229	ERNSLAW ONE LTD - Support	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 520	126	N Z FOREST MANAGERS LTD - Support	Reject
NEW ZEALAND INSTITUTE OF FORESTRY	419	16	<p>The mechanism proposed for "permitted use" under Rule 12.2 is: Rule 12.2 should make reference to a schedule "A" of approved operators, who have made application and have been approved by Council, their recognised environmental management certifications and processes. These should include FSC, PEFC, ISO14001 or other forest environmental management systems recognised under the PEFC scheme. Approval should relate to the certified status of the controller of operations rather than a particular patch of land.</p> <p>For those, normally smaller to medium sized forest managers, there should be a schedule "B" where the applicant may apply to have their performance & systems effectively assessed and approved by the Council and, subject either to periodic audit by either Council Consents officers or a registered Forestry Consultant or other qualified party recognised by Council, be able to operate on a permitted use basis. In our view the basis for people operating at this level should be that they are able to demonstrate the formation of a basic EMS incorporating the following elements;</p> <ul style="list-style-type: none"> Reference to and compliance with the NZ Environmental Code of Forestry Practice (the Code); Compliance with the NZ Forest Accord; Have developed, in association with the Code, a formal incident reporting and management system including public complaints; Have developed, in association with the Code, a formal environmental monitoring system; <p>The NZIF draws your attention to the proposal by government that its Permanent Forest Sinks Initiative (PSFI), and Emissions Trading Scheme regulations that NZIF Registered Forestry Consultants act as approved carbon certifiers. This is on the basis that RFCs are subject to a code of ethics (that provide that an RFC cannot operate outside his/her areas of expertise), CPD requirements and a complaints and disciplinary process. The NZIF asks that the Council works with the forestry sector to implement this concept as a mechanism to allow the use of the Forestry Code of Practice.</p> <p>For those undertaking small one off operations in the region and for whom</p>	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			the cost and effort of either of the options above was prohibitive the obtaining of resource consents per the plan would remain the same.	
	X 501	230	ERNSLAW ONE LTD - Support	Reject
	X 520	127	N Z FOREST MANAGERS LTD - Support	Reject
NEW ZEALAND INSTITUTE OF FORESTRY	419	17	Non-performance could be defined in terms of loss of Certification in option 1 (paragraphs 30.1) or repeated auditor/consents officer reported non-compliance in terms of option 2 (paragraph 30.2).	Reject
	X 501	231	ERNSLAW ONE LTD - Support	Reject
LOCAL FORESTRY INDUSTRY GROUP	435	2	We would wish that HRC would develop a process that allowed every forest owner to clarify site particular setback provisions.	Reject
	X 501	256	ERNSLAW ONE LTD - Support	Reject
	X 520	136	N Z FOREST MANAGERS LTD - Support	Reject
LOCAL FORESTRY INDUSTRY GROUP	435	4	We wish HRC to withdraw specifically from stipulating FSC Certification and work with the industry to implement third party auditing as may be provided by Registered Forest Consultants or Registered Resource Managers.	Reject
	X 501	258	ERNSLAW ONE LTD - Support	Reject
	X 520	138	N Z FOREST MANAGERS LTD - Support	Reject
LOCAL FORESTRY INDUSTRY GROUP	435	5	We also wish HRC to adopt Certified Operator Status for forestry contractors	Reject
	X 501	259	ERNSLAW ONE LTD - Support	Reject
	X 520	139	N Z FOREST MANAGERS LTD - Support	Reject
LOCAL FORESTRY INDUSTRY GROUP	435	7	We would wish to see this slope angle increased to 24 degrees	Reject
	X 501	261	ERNSLAW ONE LTD - Support	Reject
	X 520	141	N Z FOREST MANAGERS LTD - Support	Reject
MIDDLE DISTRICTS FARM	444	10	No specific decision requested, however submitter suggests that the 20	Reject

Submitter	Number	Point	Decision Sought	Recommendation
FORESTY ASSOCIATION			degree cutoff be increased to 24 or 25 degrees.	
	X 501	266	ERNSLAW ONE LTD - Support	Reject
	X 520	148	N Z FOREST MANAGERS LTD - Support	Reject
MIDDLE DISTRICTS FARM FORESTY ASSOCIATION	444	5	No specific decision requested but submits that The inclusion of special rules for forestry (12-2) is, inevitably, anti-forestry. There is the perception that forestry, because it needs extra rules, is more trouble and there needs to be a commitment to aid and encourage forestry on highly erodible land and in sensitive catchments.	Reject
	X 501	278	ERNSLAW ONE LTD - Support	Reject
MIDDLE DISTRICTS FARM FORESTY ASSOCIATION	444	6	No specific decision requested but believe that the NZ Forest Owners Environmental Code of Practise would be a useful basis for rules relating to production forestry.	Reject
	X 501	279	ERNSLAW ONE LTD - Support	Reject
	X 520	145	N Z FOREST MANAGERS LTD - Support	Reject
MIDDLE DISTRICTS FARM FORESTY ASSOCIATION	444	7	No specific decision requested, however submitter suggests that having approved forestry contractors would be valuable.	Reject
	X 501	280	ERNSLAW ONE LTD - Support	Reject
	X 520	146	N Z FOREST MANAGERS LTD - Support	Reject
MIDDLE DISTRICTS FARM FORESTY ASSOCIATION	444	8	No specific decision requested, however submitter suggests that rule 12-2 (a) is excessively complicated and need only concern avoiding debris and sediment entering water ways.	Accept in part
	X 501	281	ERNSLAW ONE LTD - Support	Reject
MIDDLE DISTRICTS FARM FORESTY ASSOCIATION	444	9	No specific decision requested, however submitter suggests that waiving rule 12-2 for those accredited under the Forest Stewardship Council is inappropriate.	Reject
	X 501	282	ERNSLAW ONE LTD - Support	Reject
	X 520	147	N Z FOREST MANAGERS LTD - Support	Reject
ROYAL FOREST & BIRD	460	99	Submitter supports Rule 12-2: Production Forestry.	Accept

Submitter	Number	Point	Decision Sought	Recommendation
PROTECTION SOCIETY OF NEW ZEALAND				
PAUL JAMES MACKINTOSH	465	1	I would like to be involved in the discussion and amendment of these rules. In some cases clarification might be all that is required.	Reject

4.32.1 Summarise submission points

- (a) Amend rule to remove or alter reference to land slope.
- (b) Amend rule to enable continued use of land for plantation forestry.
- (c) Amend wording of condition (c) in relation to Historic Places Trust approval.
- (d) Clarify activity status of rule.
- (e) Include measures to enable forestry operators to be accredited or to enable performance and systems assessed by Council – enable forestry activities as a permitted activity.
- (f) Recognition and endorsement of the New Zealand Environmental Code of Practice for Plantation Forestry V1.
- (g) Remove reference to FSC and/or replace with requirement to show evidence of recognised third party accreditation or adherence to the Zealand Environmental Code of Practice for Plantation Forestry V1.
- (h) Amend activity clause (e) to clarify the area to which it applies.
- (i) Remove activity clause (e) to remove the reference to 20 degree slope.
- (j) Delete matters of control except for (c).
- (k) Delete activities (a), (b) and (c) and amend remaining activities to refer to greater slopes.
- (l) Replace per property with per hectare.
- (m) Requests for alternative accreditation methods including use of Registered Forestry Consultants.
- (n) Include reference in Control/discretion matter (i) consideration of whether areas need to be permanently retired for the management of erosion and sediment control.
- (o) Extend rule to permit clearance of plantation forestry for the purposes of maintaining infrastructure.
- (p) General support.
- (q) General opposition.

4.32.2 Evaluation

As notified, Rule 12-2 clause (e) included reference to a 20 degree slope limit for activities. It is recognised that simply stating a slope angle is not sufficient for determining whether land is erosion prone. Therefore, I agree that it is appropriate to remove clause (e) to remove the reference to a particular slope.

While the clearance of vegetation associated with production forestry has potential to result in accelerated erosion where replanting is not undertaken, those areas of land used for production forestry that are replanted soon after clearance are unlikely to significantly increase the potential for accelerated erosion. Discussions between representatives of the forestry sector and Horizons staff has identified the appropriateness of including a ‘replanting’ provision in the POP to enable forestry activities as permitted activities where the cleared land is replanted within 18 months of being cleared. I agree that this approach is consistent with establishing and maintaining vegetation on land that is prone to accelerated erosion promoted by the POP. Therefore, I recommend that a specific exclusion is added to Rule 12-2 that enables vegetation clearance associated with production forestry to occur as a permitted activity provided the land cleared is replanted in vegetation within 18 months to provide an equivalent or greater level of erosion protection to that which was provided by the vegetation that was cleared. This exclusion should not apply to land disturbance associated with these activities.

The Historic Places Trust has requested a minor amendment of Condition (c) in relation to approvals from the Trust given in relation to matters involving koiwi or waahi tapu. I agree that the normal process of consultation with iwi in these matters is appropriate to document in the POP.

Submitters seeking clarification of the rule, particularly in relation to its activity status do not describe the area of uncertainty. I am of the opinion that the rule, as currently arranged, is able to be interpreted appropriately and is sufficiently clear.

As previously discussed, currently the New Zealand Environmental Code of Practice for Plantation Forestry V1 does not meet the requirements of an appropriate code of practice in terms of the requirement of the POP. To do so, the code must meet the requirements specified in Policy 12-2 and in Policy 12-1. A code must also be enforceable and clear about how it is applied in various situations. Horizons have been involved in a number of discussions with representatives of the forestry industry and this matter has been discussed at some length. I consider that it is not currently appropriate to include a code of practice in the POP that does not meet the necessary requirements. A revised code of practice can be incorporated into the POP at a later date by way of a plan change if appropriate.

At present, the Forestry Stewardship Council programme meets the necessary requirements to enable people operating in accordance with that programme to undertake forestry activities as a permitted activity. Horizons is open to considering accreditation programme of other third parties that meet the requirements set out in the POP. As with any proposal to use industry

standards as a means of achieving the outcomes of the POP, Horizons is prepared to consider this option. It may be appropriate for the submitters requesting this approach to expand on their proposal in more detail at the hearing.

As I recommend the removal of Clause (e) in its entirety, I consider this resolves the lack of clarity submitters raised about this provision.

Submissions requesting the removal of several of the matters of control associated with the rule, to be replaced only by matters pertaining to slope stability and direct discharge of sediment into waterways are not considered appropriate. The matters of control listed enable the Council to give consideration to the range of effects that are possible in association with forestry activities. To remove these matters of control may result in activities being allowed to occur that cause significant adverse effects that are unable to be controlled by the Council.

As discussed earlier in this report, the use of a per property measure of activities is in place as a trigger for activities that have the potential to cause adverse effects. Relating activities to properties also aligns with the WFBP approach, which is a property-focussed approach.

Inclusion of a specific reference in the matters of control to consideration of whether areas need to be permanently retired for the management of erosion and sediment control is not considered necessary. At present, matters of control (c), (d) and (i) provide sufficient scope to address such matters in appropriate situations.

The maintenance of infrastructure may require a degree of pruning and clearance of plantation forestry. However I do not interpret the rule as affecting non-production forestry activities (such as maintenance of infrastructure). The rule specifically relates to vegetation and land clearance 'for the purposes of harvesting production forestry or developing land for production forestry planting'. I consider that vegetation clearance, albeit forestry vegetation, for the purposes of maintaining infrastructure would not be captured by this rule. Therefore, I do not consider it necessary to make any amendment to the provision.

4.32.3 Recommendation

Accept in part submissions requesting to amend rule to remove or alter reference to land slope.

Accept in part submissions requesting production forestry to be made a permitted activity.

Accept submissions requesting to amend wording of condition (c) in relation to Historic Places Trust approval.

Reject submissions requesting to clarify activity status of rule.

Reject submissions requesting to include measures to enable forestry operators to be accredited or to enable performance and systems assessed by Council – enable forestry activities as a permitted activity.

Reject submissions requesting recognition and endorsement of the New Zealand Environmental Code of Practice for Plantation Forestry V1.

Reject submissions requesting to remove reference to FSC and/or replace with requirement to show evidence of recognised third party accreditation or adherence to the Zealand Environmental Code of Practice for Plantation Forestry V1.

Reject submissions requesting to amend activity clause (e) to clarify the area to which it applies.

Reject submissions requesting to delete matters of control except for (c).

Reject submissions requesting to delete activities (a), (b) and (c) and amend remaining activities to refer to greater slopes.

Reject submissions requesting to replace per property with per hectare.

Reject submissions requesting alternative accreditation methods including use of Registered Forestry Consultants.

Reject submissions requesting to include reference in Control/distraction matter (i) consideration of whether areas need to be permanently retired for the management of erosion and sediment control.

Reject submissions requesting to extend rule to permit clearance of plantation forestry for the purposes of maintaining infrastructure.

Accept submissions expressing general support

Reject submissions expressing general opposition.

4.32.3.1 Recommended changes to provision

Delete Activity clause (e) which refers to slopes less than 20 degrees.

Add the words '*in consultation with iwi for waahi tapu or koiwi remains*' to Condition clause (c) after the words except where Historic Places Trust approval'.

Add a new exclusion to Rule 12-2 after (f) which states: (g) For the purposes of clearing vegetation where, within 18 months of being cleared, the land that has been cleared is replanted in woody vegetation that provides an equivalent or greater level of erosion protection to the vegetation that was cleared. (these are a permitted activity under Rule 12-1).

4.33 Recommendation Land 33 Chapter 12 Rule 12-3 Land Disturbance

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
N K & C F DEIGHTON	17	1	We are deeply concerned about this law and ask you to kindly consider revising this rule as the consequences of this will be devastating on the small business.	Reject
MARION GILLARD	46	3	No specific decision requested but submitter notes that: - 100m3 per year is extremely restrictive; - previous working documents allowed for 500m3 so why the difference now?; - objects to the 20 degree slope.	Reject
MICHAEL DAVIS	48	1	Amend policy 12-3 to read. Highly erodible land is hill country with a slope greater than 45 degrees and has previously had 40 percent or more of its total area effected by erosion.	Reject
SHARN HAINSWORTH	116	14	I submit that tracking on highly erodible land should not require a Resource Consent. I submit that an alternative solution is to require bulldozer and digger drivers and helicopter pilots/scrubcutters to be accredited through the One Plan.	Reject
	X 501	1	ERNSLAW ONE LTD - Support	Reject
CLIFTON HOWARD TOMBLESON	133	5	I submit that rule 12.3 needs to read 12-3 Land disturbance Land disturbance* on Highly Erodible Land* pursuant to s9 RMA in circumstances where either the affected area is more than 10,000 m2/y per property* or the volume of fill or excavation is more than 10,000 m3/y per property*. This rule does not apply to land disturbance* that is (a)Carried out in accordance with a Whole Farm Business Plan* (this is a permitted activity under Rule 12-1), (b)On land mapped as Highly Erodible Land* in Schedule A, but where all land that is the subject of the activity has an existing slope of less than 35 degrees (this is a permitted activity under Rule 12-1),	Reject

Submitter	Number	Point	Decision Sought	Recommendation
BARY PHILIP LESLIE	137	2	That council minimise its involvement in land use activities to the management of effluent disposal (human & animal).	Reject
HAINSWORTH - KELFER PARTNERSHIP	139	4	Last minute earthworks can be completed without further consents. A mechanism is provided whereby Farmers are able to complete last minute earth works while earth-moving machinery is on the farm, without requiring a further consent.	Reject
	X 501	2	ERNSLAW ONE LTD - Support	Reject
	X 520	1	N Z FOREST MANAGERS LTD - Oppose	Reject
MERVYN H GEORGE	141	2	Amend to read " Consent required if wash from disturbed soil can directly enter a stream etc."	Reject
	X 501	3	ERNSLAW ONE LTD - Oppose	Accept
MERVYN H GEORGE	141	4	Initially, Highly Erodible land should be that with a slope greater than 40 degrees	Reject
VISIT RUAPEHU	152	12	Suggested Plan Amendment Include in Conditions/Standard/Terms: (d) The activity shall not disturb any recreational site or site of tourism value as identified in any district plan.	Reject
TARARUA DISTRICT COUNCIL	172	63	[Matters referred to in Submission as follows Some rules in Section 12 of the Plan do not provide certainty as to activity status and therefore it may be difficult for a landowner or a district planner administering the land use provisions of a District Plan to discern whether or not a consent is required and, if required, what type of consent.] - Withdraw the whole plan; or clarify - all the above matters [referring to Rule 12-3] and provide certainty of interpretation and activity status for land users and Plan users seeking to interpret and apply the rules in Section 12 of the Plan.	Reject
	X 481	334	PALMERSTON NORTH CITY COUNCIL - Support	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 485	15	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Reject
	X 495	234	RUAPEHU DISTRICT COUNCIL - Support	Reject
HORIZONS REGIONAL COUNCIL	182	27	Amend Rule 12-3 to remove Activity sub clause (b) which refers to slopes less than 20 degrees.	Accept
	X 492	206	MINISTER OF CONSERVATION - Support	Accept
	X 495	258	RUAPEHU DISTRICT COUNCIL - Oppose	Reject
	X 505	10	HIMATANGI STATION LTD - Oppose	Reject
	X 531	76	HORTICULTURE NEW ZEALAND - Oppose	Reject
	X 533	42	FEDERATED FARMERS OF NEW ZEALAND INC - Support	Accept
HORIZONS REGIONAL COUNCIL	182	28	Amend Rule 12-3 Control (a) to read: 'the nature, scale, location, timing and duration of land disturbance'	Accept
	X 495	259	RUAPEHU DISTRICT COUNCIL - Oppose	Reject
	X 505	11	HIMATANGI STATION LTD - Oppose	Reject
	X 531	77	HORTICULTURE NEW ZEALAND - Oppose	Reject
	X 533	43	FEDERATED FARMERS OF NEW ZEALAND INC - Oppose	Reject
MICHAEL JOHN ROGERS	185	1	Submitter does not specify but general theme of the submission is a removal of this rule.	Reject
GORDON MC NIE	204	1	Throw out the whole plan and seek reasonable solutions from people on the ground who know what they are talking about.	Reject
GORDON MC NIE	204	2	Do away with compulsory resource consent.	Reject
RUAPEHU FEDERATED FARMERS OF NEW ZEALAND INC	246	14	Delete provision	Reject
	X 495	59	RUAPEHU DISTRICT COUNCIL - Support	Reject
DEAN GREGORY SPARKES	270	1	Amendment to limit resource consent requirement to new works.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
DEAN GREGORY SPARKES	270	2	Amendment to exclude maintenance of existing tracks or alternatively provide a workable volume like 3-4000m3.	Reject
DEAN GREGORY SPARKES	270	3	With reasonable changes I could support the proposal but it needs to be realistic to balance business and environment.	Accept in part
HOROWHENUA DISTRICT COUNCIL	280	66	<p>[Matters referred to in Submission as follows Some rules in Section 12 of the Plan do not provide certainty as to activity status and therefore it may be difficult for a landowner or a district planner administering the land use provisions of a District Plan to discern whether or not a consent is required and, if required, what type of consent.]</p> <p>Clarify all the above matters [referring to 12-3] and provide certainty of interpretation and activity status for land users and Plan users seeking to interpret and apply the rules in Section 12 of the Plan.</p>	Reject
	X 481	427	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 485	17	AIRWAYS CORPORATION OF NEW ZEALAND – Support	Reject
	X 495	236	RUAPEHU DISTRICT COUNCIL - Support	Reject
	X 531	78	HORTICULTURE NEW ZEALAND - Support	Reject
WANGANUI DISTRICT COUNCIL	291	37	<p>[Matters referred to in Submission as follows Some rules in Section 12 of the Plan do not provide certainty as to activity status and therefore it may be difficult for a landowner or a district planner administering the land use provisions of a District Plan to discern whether or not a consent is required and, if required, what type of consent.]</p> <p>- Withdraw the whole plan; or - Clarify all the above matters [referring to 12-3] and provide certainty of interpretation and activity status for land users and Plan users seeking to interpret and apply the rules in Section 12 of the Plan. - Consider other forms of accreditation.</p>	Reject
	X 481	497	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 495	233	RUAPEHU DISTRICT COUNCIL - Support	Reject

Submitter	Number	Point	Decision Sought	Recommendation
NEW ZEALAND DEFENCE FORCE	330	24	1.Amend the concept and definition of "whole farm business plan" to include plans or similar documents providing for sustainable management of land other than farm land.	Reject
	X 501	145	ERNSLAW ONE LTD - Support	Reject
NEW ZEALAND DEFENCE FORCE	330	25	2.Amend the concept and definition of "whole farm business plan" to allow for Horizons to endorse and recognise for the purposes of the Proposed One Plan documents prepared by landowners without financial or other assistance from Horizons. (This would reduce the potential resource demands associated with Decision Sought 1 above)	Reject
	X 501	146	ERNSLAW ONE LTD - Support	Reject
TRANSIT NEW ZEALAND	336	29	That the rule be amended by adding an additional criteria where the 'rule does not apply to land disturbance that is: '(f) for the purposes of state highway maintenance and construction which is undertaken in accordance with Transit New Zealand industry based standards and codes of practice which are approved by Horizons Regional Council'.	Reject
MANAWATU DISTRICT COUNCIL	340	85	[Matters referred to in Submission as follows Some rules in Section 12 of the Plan do not provide certainty as to activity status and therefore it may be difficult for a landowner or a district planner administering the land use provisions of a District Plan to discern whether or not a consent is required and, if required, what type of consent.] Clarify all the above matters [relating to Rule 12-3] and provide certainty of interpretation and activity status for land users and Plan users seeking to interpret and apply the rules in Section 12 of the Plan.	Reject
	X 481	641	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 485	18	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Reject
	X 495	237	RUAPEHU DISTRICT COUNCIL - Support	Reject
OWEN BONNOR	341	1	That 400m ³ /y be the limit.	Reject
RANGITIKEI DISTRICT COUNCIL	346	63	[Matters referred to in Submission as follows Some rules in Section 12 of the Plan do not provide certainty as to activity	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			status and therefore it may be difficult for a landowner or a district planner administering the land use provisions of a District Plan to discern whether or not a consent is required and, if required, what type of consent.]	
			Clarify all the above matters [referring to Rule 12-3] and provide certainty of interpretation and activity status for land users and Plan users seeking to interpret and apply the rules in Section 12 of the Plan.	
	X 481	768	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 485	16	AIRWAYS CORPORATION OF NEW ZEALAND - Support	Reject
	X 495	235	RUAPEHU DISTRICT COUNCIL - Support	Reject
RANGITIKEI DISTRICT COUNCIL	346	71	Delete Rule 12-3 in its entirety, or amend by adding (f) to the end of the rule, as follows. (f) undertaken by or on behalf of, Territorial Authorities for the purpose of managing district roading networks.	Accept in part
	X 481	776	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
NEW ZEALAND HISTORIC PLACES TRUST - CENTRAL REGION	353	18	References in the proposed One Plan that require applicants to obtain authority from the NZHPT for an archaeological site, be reworded to the following effect - any archaeological site, waahi tapu or koiwi remains as identified in the regional plan, any district plan, in the New Zealand Archaeological Associations Site Recording Scheme, or by the Historic Places Trust except where Historic Places Trust approval in consultation with iwi for waahi tapu or koiwi remains has been obtained.	Accept
JOHN BATLEY	355	3	Vegetation and land clearance regulation take no account of the size of the property and the areas/volumes are incredibly low, as is the water use.	Accept in part
	X 502	124	NEW ZEALAND DEFENCE FORCE - Support	Accept in part
ENVIRONMENT NETWORK MANAWATU	356	44	ENM generally support this rule, but would make the comment that with the map provided it would be difficult for a property owner or general member of the public	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
			to know if land was HEL land or not.	
	X 492	205	MINISTER OF CONSERVATION - Support	Accept in part
MERIDIAN ENERGY LIMITED	363	145	Meridian opposes Rule 12-3 and requests the following amendments or similar: Renewable energy development is covered by a separate rule and classified as a permitted activity where a renewable energy development plan is submitted to the Council. See Meridian's primary submission to Chapter 12. [363/135] Any consequential amendments necessary to give effect to this submission	Reject
	X 492	207	MINISTER OF CONSERVATION - Oppose	Accept
	X 511	400	TRUST POWER LIMITED - Support	Reject
MERIDIAN ENERGY LIMITED	363	146	Meridian opposes Rule 12-3 and requests the following amendments or similar: Amend text under the heading "Activity" to add a new condition as follows: (f) carried out in accordance with a renewable energy development plan (this is a permitted activity under Rule 12-1). Any consequential amendments necessary to give effect to this submission	Reject
	X 492	208	MINISTER OF CONSERVATION - Oppose	Accept
FEDERATED FARMERS OF NEW ZEALAND INC	426	135	Delete Rule 12- 3 or in the alternative,	Reject
	X 505	18	HIMATANGI STATION LTD - Support	Reject
	X 511	402	TRUST POWER LIMITED - Support	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	136	Reword rule 12-3 as follows: "Land Disturbance on Highly Erodible Land"	Accept
	X 505	19	HIMATANGI STATION LTD - Support	Accept

Submitter	Number	Point	Decision Sought	Recommendation
FEDERATED FARMERS OF NEW ZEALAND INC	426	137	Reword rule 12-3 as follows: Amend thresholds to a per hectare amount	Accept in part
	X 502	126	NEW ZEALAND DEFENCE FORCE - Support	Reject
	X 505	20	HIMATANGI STATION LTD - Support	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	138	Reword rule 12-3 as follows: "(a) carried out in accordance with either a whole farm business plan or have implemented methods to effectively reduce accelerated erosion (this is a permitted activity under Rule 12-1)" (or words to that effect)	Reject
	X 505	21	HIMATANGI STATION LTD - Support	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	139	Reword rule 12-3 as follows: (e) for the purposes of removal or disturbance of weed and pests species.	Reject
	X 505	22	HIMATANGI STATION LTD - Support	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	140	Reword rule 12-3 as follows: Revise the list of matters to which Council reserves control, including (h).	Reject
	X 505	23	HIMATANGI STATION LTD - Support	Reject
GRANT ADKINS	428	2	Significantly increase the amount of soil that can be moved.	Reject
LOCAL FORESTRY INDUSTRY GROUP	435	8	We would wish to see this slope angle increased to 24 degrees	Reject
	X 501	262	ERNSLAW ONE LTD - Support	Reject
	X 520	142	N Z FOREST MANAGERS LTD - Support	Reject
MIDDLE DISTRICTS FARM FORESTRY ASSOCIATION	444	11	No specific decision requested, however submitter suggests amount of land disturbance be increased for larger properties.	Reject
	X 501	267	ERNSLAW ONE LTD - Support	Reject
	X 502	125	NEW ZEALAND DEFENCE FORCE - Support	Reject

Submitter	Number	Point	Decision Sought	Recommendation
NEW ZEALAND CONTRACTORS FEDERATION	458	5	A practical limit [for excavation] might be 1000m ² .	Reject
NEW ZEALAND CONTRACTORS FEDERATION	458	6	We believe the volume limitation should be 1000m ³ /year/property.	Reject
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	100	Submitter supports Rule 12-3: Land Disturbance.	Accept
	X 492	204	MINISTER OF CONSERVATION - Support	Accept
	X 505	13	HIMATANGI STATION LTD - Oppose	Reject
	X 511	401	TRUST POWER LIMITED - Oppose	Reject
PAUL JAMES MACKINTOSH	465	2	I would like to be involved in the discussion and amendment of these rules. In some cases clarification might be all that is required.	Reject
COLIN BOND	470	2	No specific decision requested, however submitter notes: While simple demarcation such as a 20 degree slope is convenient, in many situations it includes land which is clearly not highly erodible.	Accept in part

4.33.1 Summarise submission points

- (a) Amend definition of WFBP to include other activities.
- (b) Amend definition of HEL, including reference in rules to 20 degree slope.
- (c) Include reference to having implemented methods to effectively reduce accelerated erosion to activity (a).
- (d) Amend wording of condition (c) in relation to historic Places Trust approvals.
- (e) Reword rule name to 'Land disturbance on highly erodible land'.
- (f) Improve clarity of the rule.
- (g) Amend the area and /or volume of vegetation clearance and land disturbance limits.
- (h) Enable the removal of pest and weed species.
- (i) Enable energy generation facilities to be developed in accordance with an energy development plan.

- (j) Enable roading activities to be undertaken as permitted activities pursuant to Transits industry standards or by territorial authorities.
- (k) Amend Control (a) to read ‘the nature, scale locations, timing and duration of land disturbance.
- (l) General opposition.
- (m) General support.

4.33.2 Evaluation

As discussed in previous sections of this report, the amendment of the definition of WFBPs to include other activities not currently included in the SLUI programme is not considered appropriate. Such amendments may be made by way of plan change should the WFBP programme be extended to apply to other land use activities.

The current definition of HEL, which refers directly to the map in Schedule A provides little assistance to plan users in determining where HEL is in relation to individual properties. To resolve this matter, and after considerable discussion with stakeholders and submitters at pre-hearing meetings, an alternative text definition has been proposed by Horizons. This alternative, which is attached as Appendix A to this report, provides definitions for Coastal Highly Erodible Land and Hill Country Highly Erodible Land. Some concern has been expressed by submitters that there are some matters that require clarification in the definition. This includes determining what constitutes ‘active erosion’. A further prehearing meeting, involving a field day to test the definition in the field, is planned prior to the hearing but after this report has been completed. Therefore I consider that the proposed new definition is inserted into Schedule A, with appropriate amendments to the definition of Coastal Highly Erodible Land and Hill Country Highly Erodible Land in the Glossary, subject to finalisation at the hearing.

The proposed definition enables definition of HEL at the farm scale, and should be able to be determined by land users with the assistance of information material from Horizons (guidance material on determining rock type, percentages of active erosion, etc). I consider that adopting this approach addresses the concerns expressed by submitters in relation to this particular rule and other provisions in the POP.

Activity clause (b) currently includes reference to a 20 degree slope. Submitters have requested that this slope be altered or removed recognising that slope does not necessarily correspond with HEL. I concur with this sentiment and recommend that clause (d) be deleted from the rule.

Submitters request that Activity clause (a) be amended to include reference to having implemented methods to effectively reduce accelerated erosion. I consider that adding such wording does not add any clarity to the reading of the provision. Activities that are undertaken in accordance with recognised codes of practice or standards that provide for sustainable management will be included

into the POP as specific rules in the same manner as WFBPs have. It would be premature to include a general clause referring to such measures unless they were already inserted into the POP.

The Historic Places Trust has requested a minor amendment of Condition (c) in relation to approvals from the Trust given in relation to matters involving koiwi or waahi tapu. I agree that the normal proves of consultation with iwi in these matters is appropriate to document in the POP.

I agree with submitters requesting to reword rule name to 'Land disturbance on highly erodible land'. The requested change makes the rule heading more relevant to the content of the rule.

Submitters seeking clarification of the rule, particularly in relation to its activity status do not describe the area of uncertainty. I am of the opinion that the rule, as currently arranged, is able to be interpreted appropriately and is sufficiently clear.

As previously discussed, the 'per property' trigger for vegetation clearance and land disturbance areas and volumes is a reflection of the intention to consider any significant amount of work on HEL. The intention of the condition is to provide a trigger to engage the expertise of somebody experience in management of activities to minimise accelerated erosion. In reality, whether the trigger is per property or per hectare, the intention is still the same – the limit has been put in place to trigger the input of expertise. In terms of the volumes identified for the limits, these have been defined on the assumption that that scale of activity is unlikely to cause adverse effects that are more than minor. It is very likely that greater areas or volumes of vegetation clearance or land disturbance may also have no more than minor adverse effects, however these activities should be subject to expert scrutiny. The values included in the rules of the POP have been devised partly for ease of recall, which is considered important for application in practical situations where the POP document is not likely to be readily available.

As discussed earlier in this report, I agree with submitters to the extent that the removal of plants that are regarded as pests to pastoral operations should be able to be cleared without the need for resource consent. Therefore, I have recommended that the definition of 'vegetation clearance' in the Glossary is amended to include reference to such activities.

As discussed previously, the inclusion of specific rules permitting activities that are undertaken in accordance with yet to be developed codes of practice or standards would be premature. Any codes of practice or standards developed can be incorporated into the POP by way of plan change at a later date.

I agree with submitters seeking to enable land disturbance activities on HEL in relation to the maintenance of existing infrastructure. Road, rail, energy and service networks require regular maintenance to continue to function effectively and to enable communities to provide for their well-being. Maintenance of existing infrastructure will generally involve confined and small-scale vegetation clearance and land disturbance. Activities may include pruning vegetation from roadsides or under transmission lines, or earthworks

involved in the maintenance of roads and underground networks. The control of sediment runoff and erosion is addressed through the permitted activity standard in Rule 12-1. I therefore recommend the following additional exclusion from Rule 12-3:

(f) for the purposes of maintaining existing infrastructure* (this is a permitted activity under Ruler 12-1).

4.33.3 Recommendation

Reject submissions requesting to amend definition of WFBP to include other activities.

Accept in part submissions requesting to amend definition of HEL, including reference in rules to 20 degree slope.

Reject submissions requesting to include reference to having implemented methods to effectively reduce accelerated erosion to activity (a).

Accept submissions requesting to mend wording of condition (c) in relation to Historic Places Trust approvals.

Accept submissions requesting to reword rule name to 'Land disturbance on highly erodible land'.

Reject submissions requesting to improve clarity of the rule.

Reject submissions requesting to amend the area and /or volume of vegetation clearance and land disturbance limits.

Accept in part submissions requesting to enable the removal of pest and weed species.

Reject submissions requesting to enable energy generation facilities to be developed in accordance with an energy development plan.

Reject submissions requesting to enable roading activities to be undertaken as permitted activities pursuant to Transits industry standards or by territorial authorities.

Reject submissions expressing general opposition.

Accept submissions expressing general support.

4.33.3.1 Recommended changes to provision

Add a new point (f) after Activity clause (e) with the words: (f) for the purposes of maintaining existing infrastructure* (this is a permitted activity under Ruler 12-1).

Delete Activity clause (b).

Add the words 'in consultation with iwi for waahi tapu or koiwi remains' to Condition clause (c) after the words except where Historic Places Trust approval'.

Add the word 'location' to Control (a).

Amend the wording in the Rule column to: *12-3 Land disturbance on highly erodible land.*

4.34 Recommendation Land 34 Chapter 12 Rule 12-4 Vegetation clearance

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
CHRISTOPHER JOHN BAINES	39	2	Take out the Section 12-4 limiting our ability to disturb soil over 100m2 without a consent	Reject
MARION GILLARD	46	4	Abolish to 20 degree provision.	Accept
MICHAEL DAVIS	48	2	Amend policy 12-4 to read. Highly erodible land is hill country with a slope greater than 45 degrees and has previously had 40 percent or more of its total area affected by erosion.	Reject
J N TRIPE	52	6	No decision requested, however submitter asks: Rule 12.4 Vegetation clearance. On "highly erodible" hill country of more than 20% slope, vegetation clearance is not permitted. We have cultivated regularly above that level without any soil loss.	Accept in part
SHARN HAINSWORTH	116	15	I submit that an alternative solution is to require bulldozer and digger drivers and helicopter pilots/scrubcutters to be accredited through the One Plan. (as opposed to consents for vegetation clearance)	Reject
CLIFTON HOWARD TOMBLESON	133	6	I submit that rule 12-4 needs to read 12-4 Vegetation clearance Vegetation clearance* pursuant to s9 RMA in the following circumstances (a)In the case of Coastal Highly Erodible Land*, the affected area is more than 10,000 m2/y per property*.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			(b)In the case of Hill Country Highly Erodible Land*, the affected area is more than 20 ha/y per property*. This rule does not apply to vegetation clearance* that is (c)Carried out in accordance with a Whole Farm Business Plan*, (d)On land mapped as Hill Country Highly Erodible Land* in Schedule A, but where all land that is the subject of the activity has an existing slope of less than 35 degrees (this is a permitted activity under Rule 12-1), (e)For the purposes of controlling pests pursuant to a pest management strategy prepared under the Biosecurity Act 1993 (this is a permitted activity under Rule 12-1), (f)For production forestry purposes (this is a permitted activity under Rule 12-1 or a controlled activity under Rule 12-2)	
HAINSWORTH - KELFER PARTNERSHIP	139	3	Thistles, rushes and regenerating scrub can be cut without consents.	Accept in part
MERVYN H GEORGE	141	5	Horizons allow the cutting of thistles, rushes and regenerating scrub to occur without requiring consent. Initially, Highly Erodible land should be that with a slope greater than 40 degrees	Reject
MARAEKOWHAI WHENUA TRUST, TAWATA WHANAU TRUST, NGATI TAMA O NGATI HAUA TRUST AND TITI TIHU FARM TRUST	148	2	No decision requested but submit that they use trees for firewood, house heating and cooking requirements where houses are not connected to electricity and for cultural landscapes for fencing and stop banking around kainga and marae and that this should not be an offence.	Accept in part
NGATI KAHUNGUNU IWI INCORPORATED	180	60	In last column add: "Resource consent applications under this rule will be publicly notified."	Reject
	X 482	2	LIVESTOCK IMPROVEMENT CORP LTD - Oppose	Accept
	X 486	4	AG RESEARCH LIMITED - Oppose	Accept

Submitter	Number	Point	Decision Sought	Recommendation
	X 501	11	ERNSLAW ONE LTD - Oppose	Accept
	X 520	3	N Z FOREST MANAGERS LTD - Oppose	Accept
	X 522	310	MERIDIAN ENERGY LIMITED - Oppose	Accept
HORIZONS REGIONAL COUNCIL	182	29	Amend Rule 12-4 to remove Activity sub clause (b) which refers to slopes less than 20 degrees.	Accept
HORIZONS REGIONAL COUNCIL	182	30	<p>Amend Rule 12-4 to change Classification from 'Discretionary' to 'Restricted Discretionary' and add the following standards:</p> <p>(b) The activity shall not take place on a coastal foredune or near a water body as regulated by Rule 12-5.</p> <p>(c) The activity shall not disturb any archaeological site, waahi tapu or koiwi remains as identified in any district plan, in the New Zealand Archaeological Association's Site Recording Scheme, or by the Historic Places Trust except where Historic Places Trust approval has been obtained.</p> <p>And add the following matters of Control: Control is reserved over:</p> <p>(a) the nature, scale, location, timing and duration of land disturbance</p> <p>(b) compliance with best management practices</p> <p>(c) measures to maintain slope stability</p> <p>(d) the method of sediment retention and control of sediment run-off</p> <p>(e) effects on riparian margins and water bodies</p> <p>(f) effects on rare and threatened habitats*, and at-risk habitats*</p> <p>(g) effects on existing structures</p> <p>(h) qualifications required of contractors</p> <p>(i) revegetation requirements</p> <p>(j) procedures in the event of discovering or disturbing an archaeological site, waahi tapu or koiwi remains</p> <p>(k) duration of consent</p> <p>(l) review of consent conditions</p>	Accept

Submitter	Number	Point	Decision Sought	Recommendation
			(m) compliance monitoring. Resource consent applications under this rule will not be notified and written approval of affected persons will not be required (notice of applications need not be served on affected persons).	
	X 492	209	MINISTER OF CONSERVATION - Support	Accept
	X 525	43	GENESIS POWER LTD - Support	Accept
	X 531	79	HORTICULTURE NEW ZEALAND - Support in Part	Accept
	X 533	44	FEDERATED FARMERS OF NEW ZEALAND INC - Oppose	Reject
MICHAEL JOHN ROGERS	185	2	Submitter does not specify but general theme of the submission is a removal of this rule.	Reject
MALCOLM FARMING LTD	195	2	I would like to submit that if the Plan goes ahead that any reference to clearing land requiring consent that the clearing of Manuka, Kanuka, Tauhini and Tutsan be regarded as of right and not require a consent.	Reject
GORDON MC NIE	204	3	Throw out the whole plan and seek reasonable solutions from people on the ground who know what they are talking about.	Reject
GORDON MC NIE	204	4	Do away with compulsory resource consent.	Reject
RUAPEHU FEDERATED FARMERS OF NEW ZEALAND INC	246	15	Delete provision	Accept in part
			Amend rule to allow for the removal and/or disturbance of plant/weed species, irrespective of their location.	
POWERCO LIMITED	272	34	T1 - Rule 12-4 to have an additional exemption to read "(g) carried out for the purpose of maintaining an infrastructure corridor to comply with the provisions of the Electricity (Hazards from Trees) Regulations 2003."	Accept in part
NEW ZEALAND DEFENCE FORCE	330	26	1.Amend the concept and definition of "whole farm business plan" to include plans or similar documents providing for sustainable management of land other than farm land.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 501	147	ERNSLAW ONE LTD - Support	Reject
NEW ZEALAND DEFENCE FORCE	330	27	2.Amend the concept and definition of "whole farm business plan" to allow for Horizons to endorse and recognise for the purposes of the Proposed One Plan documents prepared by landowners without financial or other assistance from Horizons. (This would reduce the potential resource demands associated with Decision Sought 1 above)	Reject
RANGITIKEI DISTRICT COUNCIL	346	117	Delete Rule 12-3 in its entirety, or amend by adding (g) to the end of the rule, as follows. (g) undertaken by or on behalf of, Territorial Authorities for the purpose of managing district roading networks.	Accept in part
	X 481	822	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
JOHN BATLEY	355	4	Vegetation and land clearance regulation take no account of the size of the property and the areas/volumes are incredibly low, as is the water use.	Accept in part
ENVIRONMENT NETWORK MANAWATU	356	45	ENM generally support these rules, but are concerned at the lack of guidance given to conditions/standards/terms given. The way the rules are set out lacks coherence and we can only assume that objectives in the RPS would be referred to.	Reject
MERIDIAN ENERGY LIMITED	363	147	Meridian opposes Rule 12-4 in its entirety and seeks its deletion. Any consequential amendments necessary to give effect to this submission	Reject
	X 511	403	TRUST POWER LIMITED - Support	Reject
MERIDIAN ENERGY LIMITED	363	148	Meridian requests that renewable energy generation facilities are classified as a permitted activity as requested in its primary submission to Chapter 12. Any consequential amendments necessary to give effect to this	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			submission	
	X 511	404	TRUST POWER LIMITED - Support	Reject
MINISTER OF CONSERVATION	372	135	Add 'or any at-risk habitat after 'threatened habitat'.	Accept
	X 511	406	TRUST POWER LIMITED - Oppose	
	X 531	80	HORTICULTURE NEW ZEALAND - Oppose	
	X 533	45	FEDERATED FARMERS OF NEW ZEALAND INC - Oppose	
C R GRACE, M HURLEY, HINAU STATION LTD, DUNCAN LAND CO LTD, TE KUMU ESTATES LTD, OTAIRI STATION LTD, A HURLEY KNOWN JOINTLY AS "THE HUNTERVILLE HILL COUNTRY OBJECTORS"	422	5	We repeat the submissions we made earlier about the definition of "HEL". Those points apply equally to Rule 12.4. There needs to be a more specific definition of "HEL" that is not all encompassing and vague. It needs to be set out in writing in language that is easily understood or contains formulas that are easily interpreted. Additionally, it needs to be more specific to terrain, slope, and soil type and so forth so that the blanket effect of the current definition is avoided. In this way, Council would in our submission, reduce significantly the number of Resource Consents required or alternatively, avoid the number and expense of WFBP's that are required and save everyone a lot of time, trouble and money. There would still be requirement for Resource Consents for "at risk land" but large parts of what has been coloured "red" in Schedule "A" would be released from the "HEL" definition. In keeping with an amended definition of "HEL" we submit the 20 degrees tolerance would be raised and perhaps soil type and terrain would also be considerations. In our view, in its present form, the Rule is far too restrictive and is unrealistic when viewed against its purpose	Accept in part
	X 477	1	PRITCHARD GROUP LIMITED - Support	Accept in part
C R GRACE, M HURLEY, HINAU STATION LTD, DUNCAN LAND CO LTD, TE KUMU ESTATES LTD, OTAIRI STATION LTD, A HURLEY KNOWN	422	6	In our submission, the Council's policies and rules for Biosecurity issues should be part and parcel of the "One Plan".	Reject

Submitter	Number	Point	Decision Sought	Recommendation
JOINTLY AS "THE HUNTERVILLE HILL COUNTRY OBJECTORS"				
FEDERATED FARMERS OF NEW ZEALAND INC	426	141	Delete Rule 12- 4	Reject
	X 511	407	TRUST POWER LIMITED - Support	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	142	Reword rule 12-4 as follows: Amend Vegetation in the Glossary to give effect to this submission point	Accept in part
FEDERATED FARMERS OF NEW ZEALAND INC	426	143	Amend thresholds to a per hectare amount	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	144	(e) for the purposes of removal or disturbance of controlling weed and pests species pursuant to the pest management strategy prepared under the Biosecurity Act 1993. Consequential amendment through this chapter and the Plan	Reject
	X 525	20	GENESIS POWER LTD - Oppose	Accept
GRANT ADKINS	428	3	Allow the control of scrub.	Accept in part
LOCAL FORESTRY INDUSTRY GROUP	435	9	We would wish to see this slope angle increased to 24 degrees	Reject
	X 501	263	ERNSLAW ONE LTD - Support	Reject
	X 520	143	N Z FOREST MANAGERS LTD - Support	Reject
GEORGE R ROSS	441	4	Chapter 12 - Rule 12.4 - Vegetation Clearance; Volume and Area should be scaled to give an equitable outcome.	Reject
NEW ZEALAND CONTRACTORS FEDERATION	458	4	A more practical limit [for the coastal highly erodible land area] would be at least 1000m2. The limit of 1ha for hill country highly erodible land is probably more than enough for a contractor	Reject
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	101	Submitter supports Rule 12-4: Vegetation clearance. "This rule is clear and appropriate given the severity of erosion related	Accept

Submitter	Number	Point	Decision Sought	Recommendation
			impacts that have occurred due to inappropriate vegetation clearance."	
	X 511	405	TRUST POWER LIMITED - Oppose	Reject

4.34.1 Summarise submission points

- (a) Extend WFBP definition to include other activities.
- (b) Amend definition of HEL and/or amend reference to slope.
- (c) Amend the limits for vegetation clearance.
- (d) Amend to enable control of weed and pest plant species.
- (e) Amend wording of activity clause (e).
- (f) Amend the notification requirements of the rule to require all resource consent applications to be publicly notified.
- (g) Enable accreditation of operators.
- (h) Amend classification from discretionary to restricted discretionary and add matters of discretion.
- (i) Amend to enable maintenance of infrastructure.
- (j) Provide for energy generation facilities as permitted activities.
- (k) General opposition.
- (l) General support.

4.34.2 Evaluation

As discussed previously, the inclusion of specific rules permitting activities that are undertaken in accordance with yet to be developed codes of practice or standards would be premature. Any codes of practice or standards developed can be incorporated into the POP by way of plan change at a later date.

As described in the section of this report relating to Schedule A, I recommend that the definition of HEL be amended from the current map to a textual version that can be applied at the farm scale.

As previously recommended, I consider it appropriate to delete clauses making reference to slope as a means of identifying HEL. In this section, the removal of Activity clause (d) is recommended.

I do not consider that the limits in area for vegetation clearance should be amended, as they provide an easily recalled trigger for land users to involve expert input into the design and management of their activities. Horizons have given an undertaking to implement a 'consents in the field' approach to consenting vegetation clearance activities on HEL. Please refer to earlier comments within this report (rule 12-3) on this matter.

However, related to the above matter, the rule does not currently recognise that vegetation clearance is likely to be appropriate where the land is replanted with vegetation that will have an equivalent level of erosion protection to that provided by the vegetation removed. Situations where vegetation is removed but replanted soon afterwards, such as wood lots, are unlikely to result in significant increases in accelerated erosion. I therefore consider that it is appropriate to enable such activities to occur as permitted activities and recommend that an exclusion is added to Rule 12-4 to this end. The time limit for replanting would correspond to the time limit referred to in the similar exclusion for Rule 12-2 – 18 months as this reflects a reasonable period of time between clearance and replanting to coincide with at least one planting season.

As discussed earlier in this report, I agree with submitters to the extent that the removal of plants that are regarded as pests to pastoral operations should be able to be cleared without the need for resource consent. Therefore, I have recommended that the definition of 'vegetation clearance' in the Glossary is amended to include reference to such activities.

The decision as to whether or not to publicly notify a resource consent application is best assessed at that time the application is made. The decision on whether or not to notify an application is pivotal on an assessment by the Council at the time as to whether the effects of the activity on the environment are likely to be more than minor. I consider that it would be inappropriate to pre-judge applications without considering the effects of those activities on a case by case basis.

As discussed in the section of this report related to plantation forestry, an approach where contractors are accredited as operators and that activities undertaken by those people in accordance with their accredited practices is an approach that Horizons is happy to consider. However it is not appropriate to include provisions within the POP until such time as such accreditation schemes have been developed and assessed to be appropriate in terms of the requirements of the POP. Submitters may wish to present evidence at the hearing which supports the development of an accredited operator scheme.

Horizons has made a submission to amend the classification of this rule from discretionary to restricted discretionary and add matters of discretion. The principal reason for this is to enable the opportunity for rapid resource consent assessment to occur in the field to minimise delays to landowners. I am of the opinion that the proposed matters of discretion proposed by Horizons in its submission are appropriate for managing the potential effects of vegetation clearance, and the restricted discretionary activity status retains the opportunity to decline consent in appropriate situations. I therefore recommend that the activity classification for Rule 12-4 is amended to Restricted Discretionary and the proposed standards and matters of discretion are inserted.

As discussed earlier in this report, I agree with submitters to the extent that the removal of plants that are regarded as pests to pastoral operations should be able to be cleared without the need for resource consent. Therefore, I have recommended that the definition of ‘vegetation clearance’ in the Glossary is amended to include reference to such activities.

As discussed previously, the inclusion of specific rules permitting activities that are undertaken in accordance with yet to be developed codes of practice or standards would be premature. Any codes of practice or standards developed can be incorporated into the POP by way of plan change at a later date.

I agree with submitters seeking to enable land disturbance activities on HEL in relation to the maintenance of existing infrastructure. Road, rail, energy and service networks require regular maintenance to continue to function effectively and to enable communities to provide for their well-being. Maintenance of existing infrastructure will generally involve confined and small-scale vegetation clearance and land disturbance. Activities may include pruning vegetation from roadsides or under transmission lines, or earthworks involved in the maintenance of roads and underground networks. The control of sediment runoff and erosion is addressed through the permitted activity standard in Rule 12-1. I therefore recommend that an additional exclusion from Rule 12-4:

(f) for the purposes of maintaining existing infrastructure* (this is a permitted activity under Ruler 12-1).

I do not consider that specific reference to renewable energy generation activities is necessary to include in the provision. Such activities may be able to be undertaken in the future as permitted activities where appropriate codes of practice or standards are implemented, however this has not yet been done. At present, I consider that it is appropriate for large-scale activities to have to proceed through a resource consent process in order to enable full consideration of actual and potential effects on the environment.

4.34.3 Recommendation

Reject submissions requesting to extend WFBP definition to include other activities.

Accept in part submissions requesting to amend definition of HEL and/or amend reference to slope.

Accept in part submissions requesting to amend the limits for vegetation clearance.

Accept in part submissions requesting to amend to enable control of weed and pest plant species.

Reject submissions requesting to amend wording of activity clause (e).

Reject submissions requesting to amend the notification requirements of the rule to require all resource consent applications to be publicly notified.

Reject submissions requesting to enable accreditation of operators.

Accept submissions requesting to amend classification from discretionary to restricted discretionary and add matters of discretion.

Accept in part submissions requesting to amend to enable maintenance of infrastructure.

Reject submissions requesting to provide for energy generation facilities as permitted activities.

Reject submissions expressing general opposition.
Accept submissions expressing general support.

4.34.3.1 Recommended changes to provision

Amend definition of HEL and modify Schedule A (this matter is addressed in the sections of this report which deal with Glossary terms and Schedule A)

Add an exclusion point after (f): (g) For the purposes of clearing vegetation where, within 18 months of being cleared, the land that has been cleared is replanted in woody vegetation that provides an equivalent or greater level of erosion protection to the vegetation that was cleared. (these are a permitted activity under Rule 12-1).

Add a new exclusion point (h): (h) for the purposes of maintaining existing infrastructure* (this is a permitted activity under Ruler 12-1).

4.35 Recommendation Land 35 Chapter 12 Rule 12-5 Vegetation clearance and land disturbance on coastal foredunes and near waterbodies

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
MERVYN H GEORGE	141	3	Amend to read	Accept in part
RUAPEHU DISTRICT COUNCIL	151	146	That Rule 12-5 be amended to reduce the consent requirement for works on any slopes within the vicinity of a watercourse to require consent for land disturbance and vegetation clearance only within 5 metres of a waterbody. Or Alternatively, add a new sub-number for those activities for which Rule 12.5 does not apply to, which are listed in subsection (f) undertaken by or on behalf of, Territorial Authorities for the purpose of managing district roading networks and other infrastructure.	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
	X 481	211	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
MOUNTAIN CARROTS N Z LTD	179	10	Delete: Clause c) - setbacks from artificial water bodies.	Reject
MOUNTAIN CARROTS N Z LTD	179	11	Amend Clause b i) for rivers lakes and wetlands in areas where the land slope is between 0 degrees and 15 degrees and within 5 metres of a Site of Significance Aquatic.	Reject
NGATI KAHUNGUNU IWI INCORPORATED	180	61	In last column add: "Resource consent applications under this rule will be publicly notified."	Reject
	X 482	3	LIVESTOCK IMPROVEMENT CORP LTD - Oppose	Accept
	X 486	5	AG RESEARCH LIMITED - Oppose	Accept
	X 501	12	ERNSLAW ONE LTD - Oppose	Accept
	X 520	4	N Z FOREST MANAGERS LTD - Oppose	Accept
HORIZONS REGIONAL COUNCIL	182	31	Add a new sub clause to rule 12-5 Activity: "(f) undertaken by, or on behalf of, the Regional Council in accordance with the Environmental Code of practice for River Works, Horizons Regional Council, August 2007 [or adopted version]"	Accept
	X 495	224	RUAPEHU DISTRICT COUNCIL - Support	Accept
	X 500	164	TARARUA DISTRICT COUNCIL - Oppose	Reject
	X 507	164	MANAWATU DISTRICT COUNCIL - Oppose	Reject
	X 515	164	HOROWHENUA DISTRICT COUNCIL - Oppose	Reject
	X 517	74	RANGITIKEI DISTRICT COUNCIL - Oppose	Reject
	X 532	164	WANGANUI DISTRICT COUNCIL - Oppose	Reject
DAVID JOHN GREENWOOD	225	10	Delete: Clause c) - setbacks from artificial water bodies.	Reject
DAVID JOHN GREENWOOD	225	11	Amend Clause b i) for rivers lakes and wetlands in areas where the land slope is between 0 degrees and 15 degrees and within 5 metres of a Site of Significance Aquatic.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
HOROWHENUA FRUITGROWERS ASSOCIATION	232	5	Delete: Clause c) - setbacks from artificial water bodies.	Reject
HOROWHENUA FRUITGROWERS ASSOCIATION	232	6	Amend Clause b i) for rivers lakes and wetlands in areas where the land slope is between 00 and 15 0 and within 10 metres of a Site of Significance - Aquatic.	Reject
PALMERSTON NORTH CITY COUNCIL	241	99	That Horizons amend Rule 12-5, or alternatively amend the definition of vegetation clearance, to permit roadside vegetation clearance carried out under the direction of the roading authority.	Accept in part
	X 500	293	TARARUA DISTRICT COUNCIL - Support	Accept in part
	X 507	293	MANAWATU DISTRICT COUNCIL - Support	Accept in part
	X 515	295	HOROWHENUA DISTRICT COUNCIL - Support	Accept in part
	X 517	281	RANGITIKEI DISTRICT COUNCIL - Support	Accept in part
	X 532	293	WANGANUI DISTRICT COUNCIL - Support	Accept in part
RUAPEHU FEDERATED FARMERS OF NEW ZEALAND INC	246	16	Delete Provision	Reject
POWERCO LIMITED	272	35	U1 - Rule 12-5 to have an additional exemption to read "(f) for the purpose of maintaining an infrastructure corridor to comply with the provisions of the Electricity (Hazards from Trees) Regulations 2003 or for the purpose of maintaining and operating infrastructure."	Accept in part
KIM YOUNG & SONS LTD	315	10	Delete: Clause c) - setbacks from artificial water bodies.	Reject
KIM YOUNG & SONS LTD	315	11	Amend Clause b i) for rivers lakes and wetlands in areas where the land slope is between 0 degrees and 15 degrees and within 5 metres of a Site of Significance Aquatic.	Reject
KAPITI GREEN LIMITED	317	10	Amend Clause b i) for rivers lakes and wetlands in areas where the land slope is between 0 degrees and 15 degrees and within 5 metres of a Site of Significance Aquatic.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
KAPITI GREEN LIMITED	317	9	Delete: Clause c) - setbacks from artificial water bodies.	Reject
RANGITIKEI DISTRICT COUNCIL	346	118	Amend Rule 12-5 to reduce the consent requirement for works on any slopes within the vicinity of a watercourse to require consent for land disturbance and vegetation clearance only within 5 metres of a waterbody. Amended wording is provided below: Rule 12-.5: Vegetation Clearance and land disturbance on coastal foredunes and near water bodies: Discretionary Activity Vegetation clearance and land disturbance, including cultivation, pursuant to s 9 RMA in the following areas: (a) for coastal foredunes*, on any land along the west coast of the Region between the coastal marine area and the inland margin of the coastal foredune (b) for rivers, lakes and natural wetlands: (i) in areas within 5 metres of any permanently flowing river, or any other river with a bed width in excess of 2 metres, or any other lake or any other wetland. (c) for artificial water bodies, within 5 m of the wetted perimeter of the water body.	Accept in part
	X 481	823	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 531	81	HORTICULTURE NEW ZEALAND - Oppose	Accept in part
RANGITIKEI DISTRICT COUNCIL	346	119	Alternatively, add a new sub-number for those activities for which Rule 12-5 does not apply to, which are listed in subsection (d) and (e) of Rule 12-5, as follows: (f) undertaken by or on behalf of, Territorial Authorities for the purpose of managing district roading networks.	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
	X 481	824	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
WOODHAVEN GARDENS LTD	347	10	Delete: Clause c) - setbacks from artificial water bodies.	Reject
WOODHAVEN GARDENS LTD	347	11	Amend Clause b i) for rivers lakes and wetlands in areas where the land slope is between 0 degrees and 15 degrees and within 5 metres of a Site of Significance Aquatic.	Reject
DAVID YOUNG	348	10	Delete: Clause c) - setbacks from artificial water bodies.	Reject
DAVID YOUNG	348	11	Amend Clause b i) for rivers lakes and wetlands in areas where the land slope is between 0 degrees and 15 degrees and within 5 metres of a Site of Significance Aquatic.	Reject
ALMADALE PRODUCE LTD	350	10	Delete: Clause c) - setbacks from artificial water bodies.	Reject
ALMADALE PRODUCE LTD	350	11	Amend Clause b i) for rivers lakes and wetlands in areas where the land slope is between 0 degrees and 15 degrees and within 5 metres of a Site of Significance Aquatic.	Reject
ENVIRONMENT NETWORK MANAWATU	356	46	ENM generally support these rules, but are concerned at the lack of guidance given to conditions/standards/terms given. The way the rules are set out lacks coherence and we can only assume that objectives in the RPS would be referred to.	Accept in part
HORTICULTURE NEW ZEALAND	357	112	Decisions Sought: Amend Rule 12-5 clause b i) to read: for rivers lakes and wetlands in areas where the land slope is between 00 and 15 0 and within 5 metres of a Site of Significance - Aquatic. Delete Clause c) - setbacks from artificial water bodies.	Reject
MERIDIAN ENERGY LIMITED	363	149	Meridian opposes Rule 12-5 and requests the following amendments or similar: Classify vegetation clearance and land disturbance associated with renewable energy generation facilities as a permitted activity as requested in	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			Meridian's primary submission to Chapter 12. Any consequential amendments necessary to give effect to this submission	
	X 492	211	MINISTER OF CONSERVATION - Oppose	Accept
	X 511	408	TRUST POWER LIMITED - Support	Reject
MERIDIAN ENERGY LIMITED	363	150	Meridian opposes Rule 12-5 and requests the following amendments or similar: Add a new section (f) under the heading "Activity" as follows: (f) for renewable energy generation facilities carried out in accordance with a renewable energy development plan (this is a permitted activity under Rule 12-1). Any consequential amendments necessary to give effect to this submission	Reject
MERIDIAN ENERGY LIMITED	363	151	In the event that Meridian's preference to have a separate permitted activity rule for renewable energy generation facilities is not accepted, Meridian requests that Rule 12-5 is amended as follows or similar: Amend section (b) under the heading "Activity" as follows: (b)(i) in areas within 5 metres of any permanently flowing river, or any other river with a bed width in excess of 2 metres, or any other lake or any other wetland. Delete subsection (b)(ii) Delete condition (a) with regard to reference of rare or threatened habitats. Any consequential amendments necessary to give effect to this submission	Accept in part
	X 492	212	MINISTER OF CONSERVATION - Oppose	Accept in part
MINISTER OF CONSERVATION	372	136	Retain the rule as proposed.	Accept in part
	X 495	238	RUAPEHU DISTRICT COUNCIL - Oppose	Reject
	X 511	409	TRUST POWER LIMITED - Oppose	Reject
HOROWHENUA	392	2	Delete:	Reject

Submitter	Number	Point	Decision Sought	Recommendation
DISTRICT GROWERS ASSOCIATION			Clause c) - setbacks from artificial water bodies.	
HOROWHENUA DISTRICT GROWERS ASSOCIATION	392	3	Amend Clause b i) for rivers lakes and wetlands in areas where the land slope is between 0 degrees and 15 degrees and within 5 metres of a Site of Significance Aquatic.	Reject
	X 492	210	MINISTER OF CONSERVATION - Oppose	Accept
FEDERATED FARMERS OF NEW ZEALAND INC	426	145	Delete Rule 12- 5	Reject
	X 511	410	TRUST POWER LIMITED - Support	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	146	Formulate a new permitted activity rule, with appropriate thresholds and performance standards for land disturbance and vegetation clearance in proximity to waterbodies. Further, a exemption within this rule relating to vegetation clearance and land disturbance associated with the construction, use and maintenance of river crossings	Accept in part
	X 511	411	TRUST POWER LIMITED - Support	Accept in part
FEDERATED FARMERS OF NEW ZEALAND INC	426	147	Amend 12-5 as follows: (b) (i) in areas where the land slope is between 0 and 150 ,within 10m 5 m of a Site of Significance - Aquatic	Reject
	X 511	598	TRUST POWER LIMITED - Unknown	Reject
	X 531	82	HORTICULTURE NEW ZEALAND - Support	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	148	Delete condition (b) (ii)	Reject
	X 511	412	TRUST POWER LIMITED - Support	Reject
	X 522	311	MERIDIAN ENERGY LIMITED - Support	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	149	Delete condition (c)	Reject
	X 511	413	TRUST POWER LIMITED - Support	Reject
FEDERATED FARMERS	426	150	Amend 12-5 as follows:	Reject

Submitter	Number	Point	Decision Sought	Recommendation
OF NEW ZEALAND INC			(e) for the purposes of removal or disturbance of weed and pests species.	
FEDERATED FARMERS OF NEW ZEALAND INC	426	151	Amend 12-5 as follows: (f) for the purposes of vegetation clearance and land disturbance associated with the construction, use and maintenance of river crossings	Accept in part
			Consequential amendment through this chapter and the Plan	
LOCAL FORESTRY INDUSTRY GROUP	435	3	We would wish that HRC would develop a process that allowed every forest owner to clarify site particular setback provisions.	Reject
	X 501	257	ERNSLAW ONE LTD - Support	Reject
	X 520	137	N Z FOREST MANAGERS LTD - Support	Reject
PESCINI BROTHERS	438	2	Delete: Clause c) - setbacks from artificial water bodies.	Reject
PESCINI BROTHERS	438	4	Amend Clause b i) for rivers lakes and wetlands in areas where the land slope is between 0 degrees and 15 degrees and within 5 metres of a Site of Significance Aquatic.	Reject
LANDLINK LTD	440	83	the submitter notes: Rule 12-5; (b) is poorly worded and difficult to understand.	Reject
LANDLINK LTD	440	84	A diagram may be helpful and/or reference to a fixed point for measuring from (eg. top of bank).	Accept in part
B S YOUNG LTD	449	2	Delete: Clause c) - setbacks from artificial water bodies.	Reject
B S YOUNG LTD	449	4	Amend Clause b i) for rivers lakes and wetlands in areas where the land slope is between 0 degrees and 15 degrees and within 5 metres of a Site of Significance Aquatic.	Reject
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	102	Submitter supports Rule 12-5: Vegetation clearance and land disturbance on coastal foredunes and near water bodies.	Accept
	X 495	239	RUAPEHU DISTRICT COUNCIL - Oppose	Reject

4.35.1 Summarise submission points

- (a) Request that all resource consents be publicly notified.
- (b) Delete or amend controls on setbacks from artificial watercourses.
- (c) Enable maintenance of infrastructure as a permitted activity.
- (d) Amend provisions relating to setbacks from watercourses.
- (e) Add specific setbacks from Sites of Significance – Aquatic.
- (f) Enable works undertaken in accordance with the Environmental Code of Practice for River Works.
- (g) Amend to enable vegetation and land disturbance associated with the construction, use and maintenance of river crossings.
- (h) Enable renewable energy generation activities as a permitted activity.
- (i) General support.
- (j) General opposition.

4.35.2 Evaluation

The decision as to whether or not to publicly notify a resource consent application is best assessed at that time the application is made. The decision on whether or not to notify an application is pivotal on an assessment by the Council at the time as to whether the effects of the activity on the environment are likely to be more than minor. I consider that it would be inappropriate to pre-judge applications without considering the effects of those activities on a case by case basis.

Artificial watercourses such as drainage ditches and swales often carry water and the contaminants it contains to natural watercourses. Artificial watercourses provide a significant potential conduit for sediment transport into the river networks. The POP therefore includes a setback from these watercourses to minimise sediment discharge and the direct deposit of soil material into water. The 5 metre setback, being less than that specified for natural watercourses, recognises that artificial watercourses are often a vital piece of infrastructure within production land and therefore are in close proximity to common land disturbance activities. To require a greater setback would likely result in significant areas of land close to artificial watercourse being excluded from production and the resultant environmental benefit of a larger setback would not off-set this economic impact. The provision also recognises that artificial watercourses are often less sensitive in terms of aquatic ecosystem values and are also more defined and therefore more easily avoided. Therefore, I consider it appropriate to retain the current setback requirement from artificial watercourses in the rule.

As previously discussed, I agree that maintenance of infrastructure requiring vegetation clearance and land disturbance is necessary to enable communities to provide for the well-being. I therefore recommend that an exclusion relating the maintenance of existing infrastructure is added to the rule.

A number of submitters have raised concerns in relation to the specified setback distances from watercourses. The setback distances are regarded as inappropriate in situations where there is an area of flat or almost flat land near waterbodies. In some cases this concern extends to the ability to undertake cultivation activities. The current provisions in the rule require a 10 metre setback from waterbodies where the land slope is between 0 degrees and 15 degrees. This provision captures all of those areas of land that are relatively flat and where there is therefore a significantly reduced risk of direct discharge of soil material into waterbodies. To reflect the need to enable productive activities to occur in close proximity to waterbodies, bearing in mind that the standards for permitted activities in Rule 12-1 ensure management of erosion and sediment where larger-scale land disturbance is occurring,

I recommend that an additional setback provision is added to the rule. The proposed amendment will enable land disturbance on generally flat land (up to 5 degrees of slope) to occur up to 5 metres from the bank of the waterbody as a permitted activity. This will include cultivation, which generally occurs on flatter land.

Submitters requesting to add reference to setbacks from Sites of Significance – Aquatic appear to be proposing to use this as a means of enabling land disturbance activities in closer proximity to other waterbodies. This may partly be due to the current wording of the rule including the term ‘river’ which is undefined in the POP and therefore includes permanently and intermittently flowing waterways as defined in the Act. Land disturbance activities adjoining the beds of waterways that are not carrying water are unlikely to cause adverse effects on water quality, therefore I propose to amend the rule to refer only to rivers that are permanently flowing or which have beds wider than 2 metres (which is the current definition of river used in LM Rule 2 of the Land and Water Plan). This definition limits the rule to only applying to larger rivers that are either carrying water or are likely to carry water.

The Operations Department of Horizons has developed the Environmental Code of Practice for River Works that meets the requirements of a code of practice appropriate to be included in the POP. The code of practice relates to the works that the Operations Department is responsible for undertaken in relation to the Region’s river control schemes. The code of practice has been assessed by Horizons staff and has been found to appropriately meet the requirements necessary for its inclusion in the One Plan. The Code has been found to meet the requirements of Policy 12-1 and is also enforceable and certain. Therefore, Horizons have made a submission requesting that activities undertaken by or on behalf of the Operations Department in accordance with the code of practice are able to be undertaken as a permitted activity. It is request to include a new Activity clause (f) “undertaken by, or on behalf of, the Regional Council in accordance with the Environmental Code of Practice for River Works, Horizons Regional Council, August 2007.”

Land disturbance and vegetation clearance associated with the construction and maintenance of river crossing has the potential to cause adverse effects. Activities within or adjoining the banks of waterways have high potential for discharges of sediment into waterways. The design of crossing points can also influence how on-going management of exposed soil addressed. However I note that the POP makes provision for the establishment and maintenance of culverts, bridges and other forms of crossings as permitted

activities in Chapter 16 – Structures and Activities Involving Beds of Rivers, Lakes and Artificial Water Courses and Damming. Specifically, Rule 16-6 – Maintenance and repair of structures, and associated removal of bed material and plants, Rule 16-11 Culverts, Rule 16-12 Other structures including bridges, fords and other access structures and Rule 16-18 Minor activities involving the beds of artificial watercourses. I consider that it is appropriate that the land disturbance and vegetation clearance related to waterway crossing that are constructed and maintained in accordance with those rules mentioned above should also be enabled as permitted activities in this chapter of the POP. Enabling land disturbance associated with the maintenance of artificial watercourses such as farm drains is considered appropriate (via Rule 16-18). I therefore recommend that a specific exclusion is inserted stating “for the purposes of establishing or maintaining river crossings and activities in artificial watercourses that are permitted activities under Rules 16-6, 16-11, 16-12 and 16-18 (these are permitted activities under Rule 12-1).

As previously discussed, specifically excluding renewable energy generation activities for the provisions of the chapter is not considered appropriate without appropriate codes of practices or standards in place.

4.35.3 Recommendation

4.35.3.1 Recommended changes to provision

Amend clause (b) to: *(b) for rivers that are either permanently flowing, or with a bed width in excess of 2 metres, lakes and natural wetlands:*

Amend existing sub clause (b)(i) to *(i) in areas where the land slope is between 5° and 15°, within 10 m of the bed of a river, lake or wetland.*

Add a new sub clause (i) to clause (b) and renumber the existing sub clauses accordingly: *(i) in areas where the land slope is between 0° and 5°, within 5 m of the bed of a river, lake or wetland.*

Add a new clause (f): *(f) undertaken by, or on behalf of, the Regional Council in accordance with the Environmental Code of Practice for River Works, Horizons Regional Council, August 2007.*

Add a new clause (g): *(g) for the purposes of establishing or maintaining river crossings and artificial watercourses that are permitted activities under Rules 16-6, 16-11, 16-12 and 16-18 (these are permitted activities under Rule 12-1).*

4.36 Recommendation Land 36 Chapter 12 Rule 12-6 Vegetation clearance and land disturbance that do not comply with permitted and controlled activity rules

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
MOUNTAIN CARROTS N Z LTD	179	12	Include a new restricted discretionary rule for Cultivation that does not meet permitted activity conditions. Matters for discretion to include the methods to manage runoff.	Reject
NGATI KAHUNGUNU IWI INCORPORATED	180	62	In last column add: "Resource consent applications under this rule will be publicly notified."	Reject
	X 501	13	ERNSLAW ONE LTD - Oppose	Accept
	X 520	5	N Z FOREST MANAGERS LTD - Oppose	Accept
DAVID JOHN GREENWOOD	225	12	Include a new restricted discretionary rule for Cultivation that does not meet permitted activity conditions. Matters for discretion to include the methods to manage runoff.	Reject
RUAPEHU FEDERATED FARMERS OF NEW ZEALAND INC	246	17	Amend Activity to read "Any vegetation clearance or land disturbance (excluding cultivation)" ;	Reject
RUAPEHU FEDERATED FARMERS OF NEW ZEALAND INC	246	36	Amend the definition for Land Disturbance by adding "(excluding cultivation)" after "surfaces"	Reject
KIM YOUNG & SONS LTD	315	12	Include a new restricted discretionary rule for Cultivation that does not meet permitted activity conditions. Matters for discretion to include the methods to manage runoff.	Reject
KAPITI GREEN LIMITED	317	11	Include a new restricted discretionary rule for Cultivation that does not meet permitted activity conditions. Matters for discretion to include the methods to manage runoff.	Reject
WOODHAVEN GARDENS LTD	347	12	Include a new restricted discretionary rule for Cultivation that does not meet permitted activity conditions. Matters for discretion to include the	Reject

Submitter	Number	Point	Decision Sought	Recommendation
DAVID YOUNG	348	12	methods to manage runoff. Include a new restricted discretionary rule for Cultivation that does not meet permitted activity conditions. Matters for discretion to include the methods to manage runoff.	Reject
ALMADALE PRODUCE LTD	350	12	Include a new restricted discretionary rule for Cultivation that does not meet permitted activity conditions. Matters for discretion to include the methods to manage runoff.	Reject
ENVIRONMENT NETWORK MANAWATU	356	47	ENM generally support these rules, but are concerned at the lack of guidance given to conditions/standards/terms given. The way the rules are set out lacks coherence and we can only assume that objectives in the RPS would be referred to	Reject
HORTICULTURE NEW ZEALAND	357	113	Decision Sought: Include a new restricted discretionary rule for Cultivation that does not meet permitted activity conditions. Matters for discretion should be limited to the methods used to manage runoff.	Reject
HOROWHENUA DISTRICT GROWERS ASSOCIATION	392	4	Include a new restricted discretionary rule for Cultivation that does not meet permitted activity conditions. Matters for discretion to include the methods to manage runoff.	Reject
PESCINI BROTHERS	438	5	Include a new restricted discretionary rule for Cultivation that does not meet permitted activity conditions. Matters for discretion to include the methods to manage runoff.	Reject
B S YOUNG LTD	449	5	Include a new restricted discretionary rule for Cultivation that does not meet permitted activity conditions. Matters for discretion to include the methods to manage runoff.	Reject
ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND	460	103	Submitter supports Rule 12-6: Vegetation clearance and land disturbance that do not comply with permitted and controlled activity rules.	Accept
	X 492	213	MINISTER OF CONSERVATION - Support	Accept

4.36.1 Summarise submission points

- (a) Amend to exclude cultivation from being captured by the rule.
- (b) Provide a new restricted discretionary rule for cultivation that does not comply with the permitted activity conditions.
- (c) Require public notification of resource consents.
- (d) General support.

4.36.2 Evaluation

Submitters request that cultivation is specifically excluded from this rule. At present, the only time cultivation would be captured by this rule is if it occurred within the setbacks from watercourses specified in Rule 12-5, or if it took place on HEL and didn't meet the conditions of Rule 12-3. In such cases, the potential for sediment discharge or accelerated erosion is significant and therefore it would be appropriate to give consideration to the proposed activity via a resource consent. Provided modification is made to Rule 12-5 in relation to setbacks from watercourses, I am of the opinion that it would be unusual for cultivation activities to not be able to occur within the standards of that rule. Therefore, I consider that it would not be appropriate to specifically exclude cultivation activities from this rule. For the same reasons, I do not consider it necessary to insert a new restricted discretionary activity rule to address cultivation activities that do not comply with the permitted activity conditions in the POP.

The decision as to whether or not to publicly notify a resource consent application is best assessed at that time the application is made. The decision on whether or not to notify an application is pivotal on an assessment by the Council at the time as to whether the effects of the activity on the environment are likely to be more than minor. I consider that it would be inappropriate to pre-judge applications without considering the effects of those activities on a case by case basis.

4.36.3 Recommendation

- Reject submissions requesting to amend to exclude cultivation from being captured by the rule.
- Reject submissions requesting to provide a new restricted discretionary rule for cultivation that does not comply with the permitted activity conditions.
- Reject submissions requesting to require public notification of resource consents.
- Accept submissions expressing general support.

4.36.3.1 Recommended changes to provision

None.

4.37 Recommendation Land 37 Schedule A

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
MARION GILLARD	46	1	Areas of Highly erodible Land in Schedule A are clearly defined so Maps need to be enlarged to give the necessary detail.	Accept in part
ANTHONY DAVID & GAYLENE MAY ATKINS	56	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners	Accept in part
RICHARD JOHN & CORAL EVELYN EDWARDS	57	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
CLIFTON HOWARD TOMBLESON	58	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
PUKEKAHU FARM LTD	60	1	HEL is clearly defined and that Schedule A is	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
			withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	
DAVID EARLE ROBINS MATTHEWS	65	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
RUSSELL SULLIVAN	94	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
BRUCE EDWARD CULLEY	98	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
ALLAN FRANCIS O'NEIL & F J O'NEIL & SONS	113	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
PETER ALEXANDER ANDERSON	121	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
IAN EDWARD ROKE	142	2	this should be as a result of meaningful consultation with potentially affected property owners. I ask that highly erodible land be zoned as shown in map figure 5.1.	Reject
PHILIPA ANN ROKE	143	2	I ask that highly erodible land be zoned as shown in map figure 5.1.	Reject
HEATHER OLIVER	144	5	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
WINSTON OLIVER	145	6	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
	X 495	401	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
RUAPEHU DISTRICT COUNCIL	151	131	[Reference to Rules 12-2, 12-3 12-7 and 12-8] (a) That the maps in Schedule A are not adequate and need to be redrawn using information at a much lower level.	Accept in part
	X 481	196	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
RUAPEHU DISTRICT COUNCIL	151	206	Council seeks the map in Schedule A be replaced with figure 5.1 and the information be produced and available at a site-specific scale on the Regional Council website via a web-based interactive GIS system, with property boundaries, street addresses and road names provided.	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
	X 481	271	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
JOHN COLLIER DONALD	154	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
BARRY & GLENDA WADE	155	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
COLIN CASELEY	156	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
WARRICK & SALLY STREET	157	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
KERRY JOHN THOMPSON	175	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
HORIZONS REGIONAL COUNCIL	182	112	Remove Figure A:1 (which shows a map of properties	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation	
HORIZONS REGIONAL COUNCIL	182	113	containing highly erodible land) from Schedule A.	Accept in part	
			Insert into Schedule A Table A:1 which describes land which is considered to be highly erodible. This is attached to the submission as appendix one.		
			X 495 448 RUAPEHU DISTRICT COUNCIL - Oppose		Reject
			X 531 140 HORTICULTURE NEW ZEALAND - Oppose in Part		Reject
	X 533	64	FEDERATED FARMERS OF NEW ZEALAND INC - Support	Accept in part	
DONALD ALAN WINDLE	186	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part	
IAN DOUGLAS MC COUBRIE	187	5	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part	
RODNEY STEWART MC COUBRIE	188	3	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part	
PATRICK WILLIAM CARROLL	189	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with	Accept in part	

Submitter	Number	Point	Decision Sought	Recommendation
STUART MC NIE	198	5	potentially affected property owners. HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
ROSEANNE PARKES	217	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
LIONEL WEST	221	2	I ask that highly erodible land be zoned as shown in map figure 5.1.	Reject
DAVID JOHN WELLS	223	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
RUAPEHU FEDERATED FARMERS OF NEW ZEALAND INC	246	4	Delete Schedule A and replace with an appropriate definition for HEL, based on meaningful consultation with potentially affected land owners and occupiers	Accept in part
RICHARD PORRITT	X 495 247	398 1	RUAPEHU DISTRICT COUNCIL - Support HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
MATTHEW BLACK	248	1	HEL is to be clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
ANDREW PORRITT	249	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
GEOFFREY THOMAS BURTON	271	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
FRASER LINDSAY HORROCKS	289	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
JOHN COLIN BLACK	292	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
WILLIAM PEHI SNR	294	2	I ask that highly erodible land be zoned as shown in map figure 5.1.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
BLAIR PATRICK SHORTALL	302	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
PIRIE CONSULTANTS LTD, PACIFIC FARMS LTD, HOULT CONTRACTORS LTD, KEEGAN CONTRACTORS LTD, PARANUI CONTRACTORS LTD, RYMAN HEALTHCARE LTD, M & M EARTHMOVERS LTD, TITAN1 LTD AND O'HAGAN CONTRACTING LTD	303	19	Provide usable maps accurately defining the extent of the land being defined.	Accept in part
JAMES TRUEBRIDGE & SUE YEREX	304	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
ATIHOU - WHANGANUI INCORPORATION	309	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
N Z FOREST MANAGERS LTD	319	9	NZFM submits that Council considers providing landowners/managers with GIS overlays of these maps that can be incorporated into companies own mapping systems. This would enable boundaries to be clearly defined and landowners/managers would know explicitly how the Council categorises their land within the region	Accept in part
	X 501	144	ERNSLAW ONE LTD - Support	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
W J ROLSTON	325	1	We strongly object to the classification of areas of land on our property.	Accept in part
D J KILSBY - HALLIDAY	328	1	There should be an opportunity for land that is not erosion prone to be reclassified without having to go through a whole farm business plan.	Accept in part
DONALD JAMES POLSON	329	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
	X 524	1	DEAN GREGORY SPARKES - Support	Accept in part
NEW ZEALAND DEFENCE FORCE	330	62	Include as part of Schedule A a specification of the land use, rock, soil, slope, vegetation and other factors which comprise the definition of Highly Erodible Land.	Accept in part
NEW ZEALAND DEFENCE FORCE	330	63	If practicable include additional key defining factors in provisos (b) to Rule 12-3 and (d) to Rule 12-4.	Accept in part
NEW ZEALAND DEFENCE FORCE	330	64	Clarify and make consistent the use of terms within Schedule A and related Rules.	Accept in part
GEORGE ANTHONY MATTHEWS	333	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
MANAWATU DISTRICT COUNCIL	340	140	Delete Fig.A1.	Accept in part
	X 481	696	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
OWEN BONNOR	341	4	Figure 5.1 maybe a better guide than Fig A:1	Accept in part
OWEN BONNOR	341	5	DOC should take ownership of silt from DOC land.	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
STEWART LESLIE MATTHEWS	342	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
RANGITIKEI DISTRICT COUNCIL	346	111	Replace the map in Schedule A with Figure 5.1 and produce the information and make it available at a site-specific scale on the Horizons Regional Council website via a web-based interactive GIS, with property boundaries, street addresses and road names provided.	Accept in part
	X 481	816	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
JOHN BATLEY	355	1	As hill country has been included under the umbrella of Highly Erodible Land the Regional Council will suffer because of the constraints on our ability to manage our properties efficiently.	Accept in part
ENVIRONMENT NETWORK MANAWATU	356	24	ENM note the map shown in Schedule A is not of sufficient scale that property owners or interested parties can easily distinguish if a particular property contains HEL land.	Accept in part
	X 495	402	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
HORTICULTURE NEW ZEALAND	357	148	Decision Sought: Delete Coastal Erodible Land from Figure A.1.	Reject
	X 511	554	TRUST POWER LIMITED - Oppose	Accept
TRUST POWER LIMITED	358	142	Delete Schedule A from the Proposed Plan and any references to Schedule A elsewhere in the document. Any similar amendments to like effect.	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
			Any consequential amendments that stem from the amendment of Schedule A as proposed in this submission.	
CLAYTON & MICHELLE POTTS	361	3	No decision requested but following objection raised	Accept in part
			The One Plan maps included in the proposal indicate that the Southern King Country is highly erodible land, we disagree to this assumption, past flooding events confirm this area holds its form better than areas like the Manawatu.	
ELAINE GUBB & MICHAEL SANDERSON	362	3	No decision requested but following objection raised	Accept in part
			The One Plan maps included in the proposal indicate that the Southern King Country is highly erodible land, we disagree to this assumption, past flooding events confirm this area holds its form better than areas like the Manawatu.	
MERIDIAN ENERGY LIMITED	363	208	Meridian opposes Schedule A and requests the following or similar: Delete Schedule A; or Amend Schedule A to more accurately map the land that is highly erodible, and to include details as to which properties within the Region it affects. Any consequential amendments necessary to give effect to this submission	Accept in part
	X 511	553	TRUST POWER LIMITED - Support	Accept in part
MINISTRY OF AGRICULTURE & FORESTRY	373	42	MAF supports the change in the definition for Highly Erodible Land to class 7e land and above, as this reflects the land most at risk of eroding.	Withdrawn

Submitter	Number	Point	Decision Sought	Recommendation
MINISTRY OF AGRICULTURE & FORESTRY	373	43	The Proposed One Plan should recognise that significant erosion can also occur on class 6e land and, while this is a lower risk, it should be considered when developing whole farm business plans.	Withdrawn
ALFRED JAMES SIVYER	387	4	No specific decision requested, however submitter notes their opposition to this provision.	Accept in part
	X 495	399	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
PROPERTY RIGHTS IN NEW ZEALAND INC	393	5	PRINZ also considers that the "Whole Farm Business Plan" concept is a total waste of ratepayers money as it offers no real benefit, only creates jobs for the boys. PRINZ is also concerned , having read the Rainey Farm Plan that the writers are advocating that farmers retire land and concentrate their stock on the better classes of land. The concept of concentrating stock on one area is not a sound environment practice as all hill country farmers will tell you, it is the least amount of hooves in an area that gives the best environmental result.	Reject
	X 495	400	RUAPEHU DISTRICT COUNCIL - Support	Reject
C R GRACE, M HURLEY, HINAU STATION LTD, DUNCAN LAND CO LTD, TE KUMU ESTATES LTD, OTAIRI STATION LTD, A HURLEY KNOWN JOINTLY AS "THE HUNTERVILLE HILL COUNTRY OBJECTORS"	422	1	<p>That the definition of HEL be made more specific and it becomes a written definition, not one that relies on a map that is not specific to particular areas, and is far too encompassing</p> <p>The Council needs to devote effort to making the definition of "HEL" more specific to areas of land and more easily understood by the people that it affects.</p> <p>It needs to be set out in writing in language that is easily understood or contains formulas that are easily interpreted. Additionally, it needs to be more specific to terrain, slope, and soil type and so forth so that the blanket effect of the current definition is avoided. In</p>	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
FEDERATED FARMERS OF NEW ZEALAND INC	426	130	<p>keeping with an amended definition of "HEL" we submit the 20 tolerance would be raised and perhaps soil type and terrain would also be considerations.</p> <p>Reword the definition of Highly Erodible Land (HEL) as follows:</p> <p>Land identified as sub-classes Class VII - VIII land with high or severe potential for erosion within the NZ land resource inventory. The planning maps are indicative of the location and extent of Highly Erodible Land (HEL) within the region" (or words to that effect)</p>	Accept in part
FEDERATED FARMERS OF NEW ZEALAND INC	426	233	<p>Delete Schedule A and refer to a definition (supplied)</p> <p>Delete Coastal Erodible Land and define by way of the glossary</p>	Reject
	X 511	555	TRUST POWER LIMITED - Oppose	Accept
LOCAL FORESTRY INDUSTRY GROUP	435	1	We would wish to see this broken down into at least 4 or 5 different segments, eg coastal zones at a larger scale showing a clearer picture of HEL with or without existing forest cover. This would give a better view of what is actually there and allow more specific targeting of affected areas.	Accept in part
	X 520	135	N Z FOREST MANAGERS LTD - Support	Accept in part
MIDDLE DISTRICTS FARM FORESTY ASSOCIATION	444	3	No specific decision requested, however submitter suggests that the schedule A map be more clearly defined	Accept in part
	X 501	276	ERNSLAW ONE LTD - Support	Accept in part
	X 520	144	N Z FOREST MANAGERS LTD - Support	Accept in part
TIM MATTHEWS	445	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear,	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
WANGANUI PROVINCE OF FEDERATED FARMS INC	446	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
ANGUS GORDON	447	19	Provide more explanation of this map and a definition of Highly Erodible Land	Accept in part
ROB KIRK & TIM MATTHEWS	453	1	HEL is clearly defined and that Schedule A is withdrawn and replaced with a Schedule that enables the concerns listed [in submission] to be met in clear, unambiguous and certain manner. Preferably this should be as a result of meaningful consultation with potentially affected property owners.	Accept in part
ECOLOGIC FOUNDATION	456	4	The council should uphold the proposed definitions and maps of highly erodible land.	Accept in part

4.37.1 Summarise submission points

- (a) Amend or remove the map in Schedule A with a more accurate map or written definition of HEL.
- (b) General opposition.
- (c) General support.

4.37.2 Evaluation

The current map showing areas within the Region that are likely to include areas of HEL is considered to be of too large a scale to be useful to plan users. While it provides a useful tool for larger-scale analysis for managing activities on HEL, it is not considered to

be adequate for the POP. Therefore I agree with the submitters that the map in Schedule A is removed and a written definition of HEL is inserted in its place.

The definition of HEL has been discussed during a number of pre-hearing meetings with land owners, industry representatives and key stakeholders. A definition, which is appended to this report as Appendix A, has been agreed in principle. However there are still some matters that require resolution, primarily surrounding the method by which 'active erosion' is identified and calculated. Some submitters have identified that the current wording makes it difficult to define when an area of historic erosion actually constitutes active erosion for the purposes of the definition. This and other minor matters are intended to be explored further at a pre-hearing meeting scheduled for after this report must be distributed to submitters. I propose that any amendments as a result of subsequent pre-hearing meetings are identified at the hearing and given further consideration at that time.

4.37.3 Recommendation

Accept in part submissions requesting removal or replacement of the map in Schedule A
Accept in part those submissions expressing general opposition to the provision.
Reject submissions requesting the map be retained.

4.37.4 Recommended changes to provision

Delete Figure A:1 (map) from Schedule A.
Add the definition of HEL attached to this report as Appendix A subject to any amendments proposed at the hearing.

4.38 Recommendation Land 38 Glossary terms - Land

Table of Submitters, Submission Points and Recommendations

Submitter	Number	Point	Decision Sought	Recommendation
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	40	alternative amendments to achieve the relief sought in 331/39	Reject
	X 501	183	ERNSLAW ONE LTD - Support	Reject
	X 520	91	N Z FOREST MANAGERS LTD - Support	Reject
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	41	Amend the definition of Highly Erodible Land and/or amend the maps in Schedule A to ensure the definition only applies to that land in the region which is in fact highly erodible.	Accept in part
	X 501	184	ERNSLAW ONE LTD - Support	Accept in part
	X 520	92	N Z FOREST MANAGERS LTD - Support	Accept in part
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	43	Retain the definitions for Vegetation Clearance in the Glossary.	Accept in part
	X 501	186	ERNSLAW ONE LTD - Support	Accept in part
HORTICULTURE NEW ZEALAND	357	14	Decision Sought: Include a definition for cultivation as follows: Cultivation means preparing the soil for growing a crop or pasture and the planting, tending and harvesting of that crop.	Accept in part
FEDERATED FARMERS OF NEW ZEALAND INC	426	224	Include a definition for cultivation as follows: Cultivation means preparing the soil for growing a crop or pasture and the planting, tending and harvesting of that crop.	Accept in part
PIRIE CONSULTANTS LTD, PACIFIC FARMS LTD, HOULT CONTRACTORS LTD, KEEGAN CONTRACTORS LTD, PARANUI CONTRACTORS LTD, RYMAN HEALTHCARE	303	22	Provide usable maps in SCH A accurately defining the extent of the land being defined.	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
LTD, M & M EARTHMOVERS LTD, TITAN1 LTD AND O'HAGAN CONTRACTING LTD				
MANAWATU DISTRICT COUNCIL	340	138	Provide a clear definition for "Coastal Highly-Erodible Land or remove this definition from the Plan.	Accept in part
	X 477	4	PRITCHARD GROUP LIMITED - Support	Accept in part
	X 481	694	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
HORTICULTURE NEW ZEALAND	357	11	Decision Sought: Delete the definition of Coastal Highly Erodible Land.	Reject
	X 492	358	MINISTER OF CONSERVATION - Oppose	Accept
	X 511	543	TRUST POWER LIMITED - Support	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	222	Delete Definition	Reject
	X 492	359	MINISTER OF CONSERVATION - Oppose	Accept
	X 511	544	TRUST POWER LIMITED - Support	Reject
TRUST POWER LIMITED	358	137	Delete the definition of 'Gully' from the Proposed Plan and any references to this term elsewhere in the document.	
			Any similar amendments to like effect.	
			Any consequential amendments that stem from the amendment of this definition as proposed in this submission.	
MERIDIAN ENERGY LIMITED	363	198	Meridian requests the definition of Gully is deleted in its entirety.	
			Any consequential amendments necessary to give effect to this submission	

Submitter	Number	Point	Decision Sought	Recommendation
	X 511	546	TRUST POWER LIMITED - Support	
CHRISTOPHER JOHN BAINES	39	1	Redefine Highly Erodible land in a true and correct manner.	Accept in part
HORIZONS REGIONAL COUNCIL	182	104	Amend the glossary term for 'Highly erodible land' to read: 'Highly Erodible Land (HEL) means land that meets the criteria for highly erodible land as described in Schedule A'	Accept in part
	X 531	135	HORTICULTURE NEW ZEALAND - Oppose	Accept in part
	X 533	59	FEDERATED FARMERS OF NEW ZEALAND INC - Support	Accept in part
HORIZONS REGIONAL COUNCIL	182	105	Amend the definitions for Hill Country Highly Erodible land and Coastal Highly Erodible Land to be consistent with the amended definition of Highly Erodible Land.	Accept in part
	X 531	136	HORTICULTURE NEW ZEALAND - Oppose	Reject
	X 533	60	FEDERATED FARMERS OF NEW ZEALAND INC - Support	Accept in part
PIRIE CONSULTANTS LTD, PACIFIC FARMS LTD, HOULT CONTRACTORS LTD, KEEGAN CONTRACTORS LTD, PARANUI CONTRACTORS LTD, RYMAN HEALTHCARE LTD, M & M EARTHMOVERS LTD, TITAN1 LTD AND O'HAGAN CONTRACTING LTD	303	20	Provide usable maps in SCH A accurately defining the extent of the land being defined.	Accept in part
	X 477	2	PRITCHARD GROUP LIMITED - Support	Accept in part
MANAWATU DISTRICT COUNCIL	340	137	Provide a clear definition for "Highly-Erodible Land", or remove this definition from the Plan.	Accept in part
	X 477	3	PRITCHARD GROUP LIMITED - Support	Accept in part
	X 481	693	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
HORTICULTURE NEW ZEALAND	357	20	Decision Sought: Delete "and includes both coastal	Reject

Submitter	Number	Point	Decision Sought	Recommendation
TRUST POWER LIMITED	358	138	<p>highly erodible land and" from the definition of HEL.</p> <p>Delete the definition of 'Highly Erodible Land' from the Proposed Plan and any references to this term elsewhere in the document.</p> <p>Any similar amendments to like effect.</p> <p>Any consequential amendments that stem from the amendment of this definition as proposed in this submission.</p>	Reject
MERIDIAN ENERGY LIMITED	363	199	<p>Meridian requests the definition of Highly Erodible Land is deleted in its entirety; or</p> <p>Schedule A is amended to more accurately map the land that is highly erodible, and include details as to which properties within the Region it affects.</p> <p>Any consequential amendments necessary to give effect to this submission</p>	Reject
	X 511	547	TRUST POWER LIMITED - Support	Reject
MINISTRY OF AGRICULTURE & FORESTRY	373	41	<p>MAF supports the change in the definition for Highly Erodible Land to class 7e land and above, as this reflects the land most at risk of eroding.</p>	Withdrawn
	X 511	549	TRUST POWER LIMITED - Oppose	
FEDERATED FARMERS OF NEW ZEALAND INC	426	21	<p>Reword the definition of Highly Erodible Land (HEL) as follows:</p> <p>"Land identified as subclasses of Class VII - VIII land with high or severe potential for erosion within the NZ land resource inventory." The planning maps are indicative of the location and extent of Highly Erodible Land (HEL) within the region" (or</p>	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 511	548	TRUST POWER LIMITED - Oppose	Accept
	X 531	134	HORTICULTURE NEW ZEALAND - Oppose and Support	Accept in part
FEDERATED FARMERS OF NEW ZEALAND INC	426	227	Reword the definition of Highly Erodible Land (HEL) as follows: "Land identified as subclasses of Classes VII - VIII land prone to severe or potential erosion within the NZ land resource inventory." The planning maps are indicative of the location and extent of Highly Erodible Land (HEL) within the region" (or words to that effect)	Reject
PIRIE CONSULTANTS LTD, PACIFIC FARMS LTD, HOULT CONTRACTORS LTD, KEEGAN CONTRACTORS LTD, PARANUI CONTRACTORS LTD, RYMAN HEALTHCARE LTD, M & M EARTHMOVERS LTD, TITAN1 LTD AND O'HAGAN CONTRACTING LTD	303	21	Provide usable maps in SCH A accurately defining the extent of the land being defined.	Accept in part
MANAWATU DISTRICT COUNCIL	340	139	Provide a clear definition for "Hill Country Highly-Erodible Land" or remove this definition from the Plan.	Accept in part
	X 481	695	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
TRUST POWER LIMITED	358	139	Delete the definition of ' Hillcountry Highly Erodible Land' from the Proposed Plan and any references to this term elsewhere in the document. Any similar amendments to like effect. Any consequential amendments that stem from the amendment of this definition as proposed	Reject

Submitter	Number	Point	Decision Sought	Recommendation
MERIDIAN ENERGY LIMITED	363	200	<p>in this submission.</p> <p>Meridian requests the definition of High country Highly Erodible Land is deleted in its entirety; or</p> <p>Schedule A is amended to more accurately map the land that is highly erodible, and include details as to which properties within the Region it affects.</p> <p>Any consequential amendments necessary to give effect to this submission</p>	Accept in part
	X 511	550	TRUST POWER LIMITED - Support	Accept in part
RUAPEHU DISTRICT COUNCIL	151	143	<p>(b) Amend the glossary definition of land disturbance to read:</p> <p>"Land disturbance means the disturbance of land surfaces by any means including blading, blasting, contouring, cutting of batters, excavation, ripping, root raking, moving or removing soil or earth. This definition excludes normal maintenance and minor improvements of legally established structures, road, tracks, railway lines and existing infrastructure.</p>	Accept in part
	X 481	208	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 492	370	MINISTER OF CONSERVATION - Oppose	Accept in part
RUAPEHU DISTRICT COUNCIL	151	201	<p>Land disturbance means the disturbance of land surfaces by any means including blading, blasting, contouring, cutting of batters, excavation, ripping, root raking, moving or removing soil or earth. This definition excludes normal maintenance and upgrading of legally established structures, roads, tracks and railway lines, where these works are</p>	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
			carried out within legal road or within a road or railway designation as defined in a district plan.	
	X 481	266	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 492	368	MINISTER OF CONSERVATION - Oppose	Accept in part
TARARUA DISTRICT COUNCIL	172	70	Amend the glossary definition of land disturbance to read: "Land disturbance means the disturbance of land surfaces by any means including blading, blasting, contouring, cutting of batters, excavation, ripping, root raking, moving or removing soil or earth. This definition excludes normal maintenance and minor improvements of legally established structures, road, tracks and railway lines"	Accept in part
	X 481	341	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 523	10	TRANSPower NEW ZEALAND LTD - Support	Accept in part
MOUNTAIN CARROTS N Z LTD	179	3	Exclude cultivation from the definition of land disturbance.	Reject
	X 492	364	MINISTER OF CONSERVATION - Oppose	Accept
MOUNTAIN CARROTS N Z LTD	179	4	Include a definition for cultivation from the current Land and Water Plan as follows: Cultivation means preparing the soil for growing a crop or pasture and the planting, tending and harvesting of that crop.	Accept in part
HORIZONS REGIONAL COUNCIL	182	106	Amend the glossary term for land disturbance to include any road works within the existing road reserve.	Accept in part
	X 492	369	MINISTER OF CONSERVATION - Oppose	Reject
	X 495	397	RUAPEHU DISTRICT COUNCIL - Oppose	Reject
	X 500	174	TARARUA DISTRICT COUNCIL - Oppose	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 507	174	MANAWATU DISTRICT COUNCIL - Oppose	Reject
	X 515	174	HOROWHENUA DISTRICT COUNCIL - Oppose	Reject
	X 532	174	WANGANUI DISTRICT COUNCIL - Oppose	Reject
DAVID JOHN GREENWOOD	225	3	Exclude cultivation from the definition of land disturbance	Reject
DAVID JOHN GREENWOOD	225	4	Include a definition for cultivation from the current Land and Water Plan as follows: Cultivation means preparing the soil for growing a crop or pasture and the planting, tending and harvesting of that crop.	Accept in part
HOROWHENUA FRUITGROWERS ASSOCIATION	232	1	Delete from the definition of land disturbance.	Reject
TRANSPower NEW ZEALAND LTD	265	11	B. Delete the definition of Land Disturbance and replace it with the following: Land disturbance means the disturbance of land surfaces by any means including blading, blasting, contouring, cutting of batters, excavation, ripping, root raking, moving or removing soil or earth. This definition excludes normal maintenance of legally established structures, roads, tracks and railway lines and works on existing transmission assets..	Reject
POWERCO LIMITED	272	27	P3 - "Land disturbance" is a defined term in the Glossary. Powerco submits that the last sentence of the definition should be amended to read "This definition excludes normal maintenance, repair and operation of legally established structures, roads, tracks and railway lines."	Reject
HOROWHENUA DISTRICT COUNCIL	280	73	Amend the glossary definition of land disturbance to read:	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			"Land disturbance means the disturbance of land surfaces by any means including blading, blasting, contouring, cutting of batters, excavation, ripping, root raking, moving or removing soil or earth. This definition excludes normal maintenance and minor improvements of legally established structures, road, tracks and railway lines	
	X 481	434	PALMERSTON NORTH CITY COUNCIL - Support	Reject
WANGANUI DISTRICT COUNCIL	291	90	Amend the glossary definition of land disturbance to read: "Land disturbance means the disturbance of land surfaces by any means including blading, blasting, contouring, cutting of batters, excavation, ripping, root raking, moving or removing soil or earth. This definition excludes normal maintenance and minor improvements of legally established structures, road, tracks and railway lines	Reject
	X 481	550	PALMERSTON NORTH CITY COUNCIL - Support	Reject
KIM YOUNG & SONS LTD	315	3	Exclude cultivation from the definition of land disturbance	Reject
KIM YOUNG & SONS LTD	315	4	Include a definition for cultivation from the current Land and Water Plan as follows: Cultivation means preparing the soil for growing a crop or pasture and the planting, tending and harvesting of that crop.	Accept in part
KAPITI GREEN LIMITED	317	3	Exclude cultivation from the definition of land disturbance	Reject
KAPITI GREEN LIMITED	317	4	Include a definition for cultivation from the current Land and Water Plan as follows: Cultivation means	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
MANAWATU DISTRICT COUNCIL	340	92	preparing the soil for growing a crop or pasture and the planting, tending and harvesting of that crop.	Reject
			Amend the glossary definition of land disturbance to read: "Land disturbance means the disturbance of land surfaces by any means including blading, blasting, contouring, cutting of batters, excavation, ripping, root raking, moving or removing soil or earth. This definition excludes normal maintenance and minor improvements of legally established structures, road, tracks and railway lines	
RANGITIKEI DISTRICT COUNCIL	X 481	648	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	346	105	Land disturbance means the disturbance of land surfaces by any means including blading, blasting, contouring, cutting of batters, excavation, ripping, root raking, moving or removing soil or earth. This definition excludes normal maintenance and upgrading or of legally established structures, roads, tracks and railway lines, where these works are carried out within legal road or within a road or railway designation as defined in a district plan.	Reject
WOODHAVEN GARDENS LTD	X 481	810	PALMERSTON NORTH CITY COUNCIL - Support	Reject
	X 492	367	MINISTER OF CONSERVATION - Oppose	
WOODHAVEN GARDENS LTD	347	3	Exclude cultivation from the definition of land disturbance	Reject
WOODHAVEN GARDENS LTD	347	4	include a definition for cultivation from the current Land and Water Plan as follows: Cultivation means preparing the soil for growing a crop or pasture and the planting, tending and harvesting of that crop.	Accept in part
DAVID YOUNG	348	3	Exclude cultivation from the definition of land	Reject

Submitter	Number	Point	Decision Sought	Recommendation
DAVID YOUNG	348	4	disturbance. Include a definition for cultivation from the current Land and Water Plan as follows: Cultivation means preparing the soil for growing a crop or pasture and the planting, tending and harvesting of that crop.	Accept in part
ALMADALE PRODUCE LTD	350	3	Exclude cultivation from the definition of land disturbance	Reject
ALMADALE PRODUCE LTD	350	4	Include a definition for cultivation from the current Land and Water Plan as follows: Cultivation means preparing the soil for growing a crop or pasture and the planting, tending and harvesting of that crop.	Accept in part
HORTICULTURE NEW ZEALAND	357	21	Decisions Sought: Specifically exclude cultivation from the definition of land disturbance. Include a definition for cultivation from the current Land and Water Plan as follows: Cultivation means preparing the soil for growing a crop or pasture and the planting, tending and harvesting of that crop.	Accept in part
	X 492	366	MINISTER OF CONSERVATION - Oppose	Accept in part
HOROWHENUA DISTRICT GROWERS ASSOCIATION	392	16	Exclude cultivation from the definition of land disturbance	Reject
	X 492	365	MINISTER OF CONSERVATION - Oppose	Accept
HOROWHENUA DISTRICT GROWERS ASSOCIATION	392	17	Include a definition for cultivation from the current Land and Water Plan as follows: Cultivation means preparing the soil for growing a crop or pasture and the planting, tending and harvesting of that crop.	Accept in part
FEDERATED FARMERS OF NEW ZEALAND INC	426	228	Specifically exclude cultivation from the definition of land disturbance.	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			Include a definition for cultivation from the current Land and Water Plan as follows: Cultivation means preparing the soil for growing a crop or pasture and the planting, tending and harvesting of that crop.	
PESCINI BROTHERS	438	17	Exclude cultivation from the definition of land disturbance	Reject
PESCINI BROTHERS	438	18	Include a definition for cultivation from the current Land and Water Plan as follows: Cultivation means preparing the soil for growing a crop or pasture and the planting, tending and harvesting of that crop.	Accept in part
B S YOUNG LTD	449	17	Exclude cultivation from the definition of land disturbance	Reject
B S YOUNG LTD	449	18	Include a definition for cultivation from the current Land and Water Plan as follows: Cultivation means preparing the soil for growing a crop or pasture and the planting, tending and harvesting of that crop.	Accept in part
HANCOCK FOREST MANAGEMENT (N Z) LTD	331	42	Retain the definitions for Production Forestry in the Glossary.	Accept in part
	X 501	185	ERNSLAW ONE LTD - Support	Accept in part
	X 520	93	N Z FOREST MANAGERS LTD - Support	Accept in part
HORTICULTURE NEW ZEALAND	357	30	Decision Sought: Exclude orchard trees from the definition of tree land.	
RUAPEHU DISTRICT COUNCIL	151	140	[Reference to Rules 12-1, 12-3, 12-4, 12-5, 12-6] An amendment to the definition of vegetation clearance is required.	Accept in part
	X 481	205	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
RUAPEHU DISTRICT COUNCIL	151	142	(a) Amend the glossary definition of vegetation	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
			<p>clearance to read:</p> <p>"Vegetation clearance means the cutting, crushing, spraying, burning or other means of removal of vegetation, including indigenous and exotic plants. It does not include:</p> <p>(i) grazing</p> <p>(ii) pruning or thinning operations associated with production forestry</p> <p>(iii) the control of pest plants as defined in the Regional Pest Plant Management Strategy</p> <p>(iv) vegetation clearance carried out in the normal maintenance and improvements of legally established structures, roads, tracks and railway lines"</p>	
	X 481	207	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 492	390	MINISTER OF CONSERVATION - Oppose	Accept in part
RUAPEHU DISTRICT COUNCIL	151	205	<p>Vegetation clearance means the cutting, crushing, spraying, burning or other means of removal of vegetation, including indigenous and exotic plants. It does not include:</p> <p>(a) grazing</p> <p>(b) pruning or thinning operations associated with production forestry</p> <p>(c) the control of pest plants as defined in the Regional pest plant management strategy</p>	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
			(d) vegetation clearance associated with the normal maintenance and upgrading of legally established roads where these works are carried out within legal road.	
	X 481	270	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 501	5	ERNSLAW ONE LTD - Support	Accept in part
	X 520	2	N Z FOREST MANAGERS LTD - Support	Accept in part
TARARUA DISTRICT COUNCIL	172	69	Amend the glossary definition of vegetation clearance to read: "Vegetation clearance means the cutting, crushing, spraying, burning or other means of removal of vegetation, including indigenous and exotic plants. It does not include: (a) grazing (b) pruning or thinning operations associated with production forestry (c) the control of pest plants as defined in the Regional Pest Plant Management Strategy (d) vegetation clearance carried out in the normal maintenance and minor improvements of legally established structures, roads, tracks and railway lines"	Accept in part
	X 481	340	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 492	386	MINISTER OF CONSERVATION - Oppose	Accept in part
	X 495	392	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
	X 523	11	TRANSPower NEW ZEALAND LTD - Support	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
MOUNTAIN CARROTS N Z LTD	179	6	Include" harvesting of crops" in the exclusions in the definition of vegetation clearance.	Reject
HORIZONS REGIONAL COUNCIL	182	111	Amend the glossary term for 'vegetation clearance' to provide for normal farm activities which do not have an impact on soil erosion and which do not impact on rare, threatened or at risk habitats.	Accept in part
	X 492	391	MINISTER OF CONSERVATION - Support	Accept in part
	X 531	139	HORTICULTURE NEW ZEALAND - Oppose in Part	Accept in part
	X 533	62	FEDERATED FARMERS OF NEW ZEALAND INC - Support	Accept in part
DAVID JOHN GREENWOOD	225	6	Include "harvesting of crops" in the exclusions in the definition of vegetation clearance.	Reject
TRANSPower NEW ZEALAND LTD	265	12	C. Amend the definition of Vegetation Clearance by adding a further clause as follows: (d) vegetation trimming and removal required to meet the Electricity (Hazards from Trees) Regulations 2003.	Accept in part
POWERCO LIMITED	272	28	P4 - "Vegetation clearance" is a defined term in the Glossary. Powerco submits there should be an additional exclusion to read "tree trimming and or cutting carried out for the purpose of maintaining an 'infrastructure corridor' including any such corridor established in order to comply with the provisions of the Electricity (Hazards from Trees) Regulations 2003."	Accept in part
HOROWHENUA DISTRICT COUNCIL	280	72	Amend the glossary definition of vegetation clearance to read: "Vegetation clearance means the cutting, crushing, spraying, burning or other means of removal of	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
			vegetation, including indigenous and exotic plants. It does not include: <ul style="list-style-type: none"> (a) grazing (b) pruning or thinning operations associated with production forestry (c) the control of pest plants as defined in the Regional Pest Plant Management Strategy (d) vegetation clearance carried out in the normal maintenance and minor improvements of legally established structures, roads, tracks and railway lines" 	
	X 481	433	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 492	387	MINISTER OF CONSERVATION - Oppose	Accept in part
	X 495	393	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
WANGANUI DISTRICT COUNCIL	291	89	Amend the glossary definition of vegetation clearance to read: <p>"Vegetation clearance means the cutting, crushing, spraying, burning or other means of removal of vegetation, including indigenous and exotic plants. It does not include:</p> <ul style="list-style-type: none"> (a) grazing (b) pruning or thinning operations associated with production forestry (c) the control of pest plants as defined in the Regional Pest Plant Management Strategy 	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
			(d) vegetation clearance carried out in the normal maintenance and minor improvements of legally established structures, roads, tracks and railway lines"	
	X 481	549	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 492	389	MINISTER OF CONSERVATION - Oppose	Accept in part
	X 495	394	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
KIM YOUNG & SONS LTD	315	6	Include harvesting of crops" in the exclusions in the definition of vegetation clearance.	Reject
KAPITI GREEN LIMITED	317	6	Include harvesting of crops" in the exclusions in the definition of vegetation clearance.	Reject
MANAWATU DISTRICT COUNCIL	340	91	Amend the glossary definition of vegetation clearance to read: "Vegetation clearance means the cutting, crushing, spraying, burning or other means of removal of vegetation, including indigenous and exotic plants. It does not include: (a) grazing (b) pruning or thinning operations associated with production forestry (c) the control of pest plants as defined in the Regional Pest Plant Management Strategy (d) vegetation clearance carried out in the normal maintenance and minor improvements of legally established structures, roads, tracks and railway lines"	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
	X 481	647	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 492	388	MINISTER OF CONSERVATION - Oppose	Accept in part
	X 495	395	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
RANGITIKEI DISTRICT COUNCIL	346	110	Vegetation clearance means the cutting, crushing, spraying, burning or other means of removal of vegetation, including indigenous and exotic plants. It does not include: (a) grazing (b) pruning or thinning operations associated with production forestry (c) the control of pest plants as defined in the Regional Pest Plant Management Strategy (d) vegetation clearance associated with the normal maintenance and upgrading of legally established roads where these works are carried out within a legal road.	Accept in part
	X 481	815	PALMERSTON NORTH CITY COUNCIL - Support	Accept in part
	X 495	396	RUAPEHU DISTRICT COUNCIL - Support	Accept in part
WOODHAVEN GARDENS LTD	347	6	Include harvesting of crops in the exclusions in the definition of vegetation clearance.	Reject
DAVID YOUNG	348	6	Include harvesting of crops" in the exclusions in the definition of vegetation clearance.	Reject
ALMADALE PRODUCE LTD	350	6	Include harvesting of crops in the exclusions in the definition of vegetation clearance.	Reject
HORTICULTURE NEW ZEALAND	357	31	Decision Sought: Include 'harvesting of crops' in the exclusions in the	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			definition of vegetation clearance.	
HOROWHENUA DISTRICT GROWERS ASSOCIATION	392	19	Include harvesting of crops" in the exclusions in the definition of vegetation clearance.	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	232	Include harvesting of crops" in the exclusions in the definition of vegetation clearance.	Reject
PESCINI BROTHERS	438	20	Include harvesting of crops" in the exclusions in the definition of vegetation clearance.	Reject
B S YOUNG LTD	449	20	Include harvesting of crops" in the exclusions in the definition of vegetation clearance.	Reject
RUAPEHU DISTRICT COUNCIL	151	134	Amend the definition of "Whole Farm Business Plan" in glossary 10, paragraph (c) to read "an indigenous ecological assessment of any proposed future vegetation clearance".	Reject
	X 481	199	PALMERSTON NORTH CITY COUNCIL - Support	Reject
TARARUA DISTRICT COUNCIL	172	65	- Withdraw the whole plan; or amend - the definition of "Whole Farm Business Plan" in glossary 10, paragraph (c) to read "an ecological assessment of any proposed future vegetation clearance".	Reject
	X 481	336	PALMERSTON NORTH CITY COUNCIL - Support	Reject
POWERCO LIMITED	272	29	P5 - "Whole farm business plans" is a defined term in the Glossary. Powerco submits that the development of whole farm business plans provides an opportunity to incorporate the appropriate management of infrastructure corridors located on farms into everyday farm management. This could be achieved by adding an additional item that must be contained in the whole farm business plan to read: "the location of any network utility assets on the farm ."	Reject

Submitter	Number	Point	Decision Sought	Recommendation
HOROWHENUA DISTRICT COUNCIL	280	68	Amend the definition of "Whole Farm Business Plan" in glossary 10, paragraph (c) to read "an ecological assessment of any proposed future vegetation clearance".	
	X 481	429	PALMERSTON NORTH CITY COUNCIL - Support	Reject
WANGANUI DISTRICT COUNCIL	291	39	- Withdraw the whole plan; or - Amend the definition of "Whole Farm Business Plan" in glossary 10, paragraph (c) to read "an ecological assessment of any proposed future vegetation clearance".	Reject
	X 481	499	PALMERSTON NORTH CITY COUNCIL - Support	Reject
MANAWATU DISTRICT COUNCIL	340	87	Amend the definition of "Whole Farm Business Plan" in Glossary 10, paragraph (c) to read "an ecological assessment of any proposed future vegetation clearance".	Reject
	X 481	643	PALMERSTON NORTH CITY COUNCIL - Support	Reject
RANGITIKEI DISTRICT COUNCIL	346	65	Amend the definition of "Whole Farm Business Plan" in glossary 10, paragraph (c) to read "an ecological assessment of any proposed future vegetation clearance".	Reject
	X 481	770	PALMERSTON NORTH CITY COUNCIL - Support	Reject
MANAWATU BRANCH OF N Z GREEN PARTY	433	38	Extend Whole Farm Business Plan list of requirements (Glossary-10) to include information on shelter belts and environmental enhancement.	Reject
HAINSWORTH - KELFER PARTNERSHIP	139	6	All information is disclosed by Horizons to all participants in the consultation process without exception.	Reject
HORIZONS REGIONAL COUNCIL	182	99	Insert in the beginning of the glossary a paragraph explaining that terms in the plan marked with an	Accept in part

Submitter	Number	Point	Decision Sought	Recommendation
PIRIE CONSULTANTS LTD, PACIFIC FARMS LTD, HOULT CONTRACTORS LTD, KEEGAN CONTRACTORS LTD, PARANUI CONTRACTORS LTD, RYMAN HEALTHCARE LTD, M & M EARTHMOVERS LTD, TITAN1 LTD AND O'HAGAN CONTRACTING LTD	303	8	<p>asterix are defined in this glossary.</p> <p>Delete reference to area size and replace with a definition relating to the earning capacity of the property.</p>	Reject
HORTICULTURE NEW ZEALAND	357	2	<p>Decision Sought: That a descriptor is added either at the start of the Glossary section or an appropriate section of the Plan that states that terms defined in the 'Glossary' are identified in the text of the Plan with an asterisk *.</p>	Accept in part
HORTICULTURE NEW ZEALAND	357	3	<p>Decision Sought: Include relevant definitions from the RMA in the One Plan so that users have ready access to all necessary terms.</p>	Reject
	X 511	532	TRUST POWER LIMITED - Support	Reject
GRANT JOHN STEPHENS	369	53	<p>Add the following RMA definition to the glossary:</p> <p>Sustainable management</p> <p>Managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while:</p> <p>(a)Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations</p> <p>(b)Avoiding, remedying or mitigating any adverse effects of activities on the environment (including people)</p>	Reject

Submitter	Number	Point	Decision Sought	Recommendation
	X 522	429	MERIDIAN ENERGY LIMITED - Oppose	Reject
MASON STEWART	394	53	Add the following RMA definition to the glossary: Sustainable management Managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while: (a)Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations (b)Avoiding, remedying or mitigating any adverse effects of activities on the environment (including people)	Reject
	X 522	430	MERIDIAN ENERGY LIMITED - Oppose	Accept in part
	X 527	245	TARARUA - AOKAUTERE GUARDIANS INC (T A G) - Support	Reject
TARARUA - AOKAUTERE GUARDIANS INC (T A G)	395	53	Add the following RMA definition to the glossary: Sustainable management Managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while: (a)Sustaining the potential of natural and physical resources (excluding minerals) to meet the	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			<p>reasonably foreseeable needs of future generations</p> <p>(b)Avoiding, remedying or mitigating any adverse effects of activities on the environment (including people)</p>	
	X 521	31	Allco Wind Energy N Z Ltd - Oppose	Accept
	X 522	431	MERIDIAN ENERGY LIMITED - Oppose	Accept
SUE STEWART	396	53	<p>Add the following RMA definition to the glossary:</p> <p>Sustainable management</p> <p>Managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while:</p> <p>(a)Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations</p> <p>(b)Avoiding, remedying or mitigating any adverse effects of activities on the environment (including people)</p>	Reject
	X 522	432	MERIDIAN ENERGY LIMITED - Oppose	Accept
	X 527	304	TARARUA - AOKAUTERE GUARDIANS INC (T A G) - Support	Reject
ALISON MARGARET MILDON	401	53	<p>Add the following RMA definition to the glossary:</p> <p>Sustainable management</p> <p>Managing the use, development, and protection of</p>	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			<p>natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while:</p> <p>(a)Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations</p> <p>(b)Avoiding, remedying or mitigating any adverse effects of activities on the environment (including people)</p>	
	X 522	433	MERIDIAN ENERGY LIMITED - Oppose	Accept
	X 527	370	TARARUA - AOKAUTERE GUARDIANS INC (T A G) - Support	Reject
FEDERATED FARMERS OF NEW ZEALAND INC	426	215	Include relevant definitions from the RMA in the One Plan so that users have ready access to all necessary terms.	Reject
	X 511	537	TRUST POWER LIMITED - Support	Reject
ROBERT LEENDERT SCHRADERS	442	53	<p>Add the following RMA definition to the glossary:</p> <p>Sustainable management</p> <p>Managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while:</p> <p>(a)Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations</p>	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			(b)Avoiding, remedying or mitigating any adverse effects of activities on the environment (including people)	
	X 522	434	MERIDIAN ENERGY LIMITED - Oppose	Accept
	X 527	477	TARARUA - AOKAUTERE GUARDIANS INC (T A G) - Support	Reject
PAUL & MONICA STICHBURY	452	53	Add the following RMA definition to the glossary:	Reject
			Sustainable management	
			Managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while:	
			(a)Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations	
			(b)Avoiding, remedying or mitigating any adverse effects of activities on the environment (including people)	
	X 522	435	MERIDIAN ENERGY LIMITED - Oppose	Accept
	X 527	537	TARARUA - AOKAUTERE GUARDIANS INC (T A G) - Support	Reject
SHONA PAEWAI	467	53	Add the following RMA definition to the glossary:	Reject
			Sustainable management	
			Managing the use, development, and protection of natural and physical resources in a way, or at a rate,	

Submitter	Number	Point	Decision Sought	Recommendation
			<p>which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while:</p> <p>(a)Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations</p> <p>(b)Avoiding, remedying or mitigating any adverse effects of activities on the environment (including people)</p>	
	X 527	600	TARARUA - AOKAUTERE GUARDIANS INC (T A G) - Support	Reject
TONY PAEWAI	468	47	<p>Add the following RMA definition to the glossary:</p> <p>Environment:</p> <p>(a)ecosystems and their constituent parts, including people and communities</p> <p>(b)all natural and physical resources</p> <p>(c)amenity values</p> <p>(d)the social, economic, aesthetic and cultural conditions which affect the matters (a) to (c) or which are affected by those matters</p>	Reject
	X 527	652	TARARUA - AOKAUTERE GUARDIANS INC (T A G) - Support	Reject
TONY PAEWAI	468	57	<p>Add the following RMA definition to the glossary:</p> <p>Sustainable management</p>	Reject

Submitter	Number	Point	Decision Sought	Recommendation
			<p>Managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while:</p> <p>(a)Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations</p> <p>(b)Avoiding, remedying or mitigating any adverse effects of activities on the environment (including people)</p>	
	X 522	437	MERIDIAN ENERGY LIMITED - Oppose	Accept
	X 527	662	TARARUA - AOKAUTERE GUARDIANS INC (T A G) - Support	Reject
HORIZONS REGIONAL COUNCIL	182	108	<p>Amend the glossary term for 'property' to read: 'refers to one or more allotments as contained in a single certificate of title and includes all adjacent land in the same ownership. Land is considered to be adjacent if it is only separated by a legal road. A legal road is considered to be a property for the purposes of this plan.'</p>	Accept
	X 500	175	TARARUA DISTRICT COUNCIL - Oppose	Reject
	X 502	291	NEW ZEALAND DEFENCE FORCE - Support	Accept
	X 507	175	MANAWATU DISTRICT COUNCIL - Oppose	Reject
	X 515	175	HOROWHENUA DISTRICT COUNCIL - Oppose	Reject
	X 517	84	RANGITIKEI DISTRICT COUNCIL - Oppose	Reject
	X 532	175	WANGANUI DISTRICT COUNCIL - Oppose	Reject
	X 533	61	FEDERATED FARMERS OF NEW ZEALAND INC -	Reject

Submitter	Number	Point	Decision Sought	Recommendation
NEW ZEALAND DEFENCE FORCE	330	60	1. Property refers to one or more adjacent allotments that are in the same ownership. A legal road is considered a property for the purposes of this Plan.	Accept in part
HORTICULTURE NEW ZEALAND	357	25	Decision Sought: Amend the definition of property to be all that land which is managed by the same business entity.	Reject
MURRAY CHARLES LOWE	423	3	Change the glossary definition of "property" to accommodate Maori land blocks.	Accept in part
FEDERATED FARMERS OF NEW ZEALAND INC	426	230	Amend the definition of property to be all that land which is managed by the same business entity.	Reject
PIRIE CONSULTANTS LTD, PACIFIC FARMS LTD, HOULT CONTRACTORS LTD, KEEGAN CONTRACTORS LTD, PARANUI CONTRACTORS LTD, RYMAN HEALTHCARE LTD, M & M EARTHMOVERS LTD, TITAN1 LTD AND O'HAGAN CONTRACTING LTD	303	24	Prepare a definition which accurately describes what is being defined.	Reject

4.38.1 Summarise submission points

- (a) Amend definition of HEL.
- (b) Include definition of cultivation.
- (c) Remove definition of gully.
- (d) Amend definition of land disturbance to exclude maintenance of existing infrastructure.
- (e) Amend definition of vegetation clearance to exclude maintenance of existing infrastructure.
- (f) Amend definition of land disturbance to exclude cultivation.
- (g) Amend definition of vegetation clearance to exclude harvesting of crops.
- (h) Amend definition of vegetation clearance to provide for normal farming activities that do not impact on soil erosion and which do not impact on rare, threatened or at risk habitats.
- (i) Amend WFBP definition to include reference to location of network utilities, shelter belts, environmental enhancement and ecological assessments.

- (j) Include all RMA definitions, including ‘sustainable management’ and ‘environment’.
- (k) Add definition of sustainable management (from RMA).
- (l) Amend definition of ‘property’ to refer to land separated by legal roads.
- (m) Amend definition of property to refer to all land that is held in the same ownership or managed by the same business entity regardless of number of titles.

4.38.2 Evaluation

The proposed amendments to Schedule A and the definition of HEL have been discussed in the section of this report relating to Schedule A. However subsequent amendments to the relevant terms in the Glossary is required to align them with the new Schedule A. These changes include altering the definition of ‘Highly Erodible Land (HEL)’, ‘Hillcountry Highly Erodible Land’ and ‘Coastal Highly Erodible Land’. I recommend that each of these definitions is amended to refer directly to the definition in Schedule A.

The term ‘cultivation’ is used in the POP in several places. While the common meaning of the word would be appropriate, I consider it assists in the interpretation of the POP to include a definition in the Glossary. Therefore I propose that a definition be inserted which refers to cultivation being the preparation of land for the purpose of growing crops or pasture and any land disturbance associated with the planting, tending and harvesting of those crops.

The term ‘gully’ is not referred to in Chapter 5 or Chapter 12. There is a reference to gully in relation to Chapter 7 and therefore I consider that it is more appropriate to address this matter in that chapter.

As discussed in the section of this report which address Rules 12-3 and 12-4, I consider that it is appropriate to exclude maintenance of existing infrastructure from having to require resource consent. Rather than amend the definitions of land disturbance, I have recommended that specific exclusions in relation to the relevant rules are inserted into the POP.

As discussed in the section of this report which deals with Rule 12-5, I do not consider that it is necessary to exclude cultivation from the definition of land disturbance. The management of land disturbance associated with cultivation is still the intention of the POP and to exclude cultivation from the definition of land disturbance would remove the activity from being covered by any of the rules in the plan, including rule 12-1 which relates to permitted activities. The permitted activity standards for managing erosion and sediment discharge are considered appropriate for cultivation.

I agree that the definition of vegetation clearance does not need to include the harvesting of crops such as those associated with market gardening. However the current arrangement of the rules does not overly constrain harvesting activities. I do not consider

that it is necessary to exclude crops from the definition of vegetation clearance. Furthermore, a reference to 'crops' may require a further definition of that term to exclude such crops as plantation forests.

I agree with submitters that there is a need to amend the definition of vegetation clearance to provide for normal farming activities that do not impact on soil erosion and which do not impact on rare, threatened or at risk habitats. I have recommended changes to the existing definition to take account of these requests (see the section of this report related to Policy 5-3)

Submitters request a range of amendments to the definition of 'Whole Farm Business Plan' to include reference to location of network utilities, shelter belts, environmental enhancement and ecological assessments. The WFBP method has been developed outside the POP and therefore the definition of WFBP in the POP reflects that actual characteristics of the requirements of the WFBP programme. Therefore, a recommended change to the definition within the POP would not necessarily result in a change to the way in which WFBPs are undertaken. Therefore I do not consider it appropriate to amend the current definition other than to make it more specific that WFBPs are specific to the Sustainable Land Use Initiative (SLUI).

I do not consider that it is necessary or appropriate to include RMA definitions in the POP except where particularly relevant. The RMA is available for consideration by plan users and therefore it is not necessary to repeat all definitions in the POP.

Submitters have requested to amend the definition of 'property' to refer to land separated by legal roads. This is to reflect that land in the same ownership may be divided by a legal road but that for the purposes of the land use activity and the provisions within the POP, it can be considered as being adjacent. Other submitters have requested that the definition of property is extended to include land that may not be within the same ownership but is used or managed by the same business entity. I consider that these situations are not common and it would be difficult to construct a definition that was suitably narrow to encompass appropriate business activities while excluding others. In the case of business that operate across a number of properties under different ownership, I consider that it would be more appropriate, where resource consent is required for those activities, to consider making a single application for multiple consents to cover those various properties (as supported by Policy 12-4). Where submitters have specific examples of where the recommended definition of Property would create difficulties or inefficiencies, they may wish to describe those examples at the hearing.

4.38.3 Recommendation

Accept in part submissions requesting to amend definition of HEL.

Accept in part submissions requesting to include definition of cultivation.

Reject submissions requesting to remove definition of gully.

Reject submissions requesting to amend definition of land disturbance to exclude maintenance of existing infrastructure.

Reject submissions requesting to amend definition of vegetation clearance to exclude maintenance of existing infrastructure.

Reject submissions requesting to amend definition of land disturbance to exclude cultivation.
Reject submissions requesting to amend definition of vegetation clearance to exclude harvesting of crops.
Accept in part submissions requesting to amend definition of vegetation clearance to provide for normal farming activities that do not impact on soil erosion and which do not impact on rare, threatened or at risk habitats.
Reject submissions requesting to amend WFBP definition to include reference to location of network utilities, shelter belts, environmental enhancement and ecological assessments.
Reject submissions requesting to include all RMA definitions, including ‘sustainable management’ and ‘environment’.
Reject submissions requesting to add definition of sustainable management (from RMA).
Accept submissions requesting to amend definition of ‘property’ to refer to land separated by legal roads.
Reject submissions requesting to amend definition of property to refer to all land that is held in the same ownership or managed by the same business entity regardless of number of titles.

4.38.3.1 Recommended changes to provision

Amend definition of Coastal highly Erodible Land to: **Coastal Highly Erodible Land** means land defined as Coastal highly Erodible Land in Schedule A.

Amend definition of Highly Erodible Land (HEL) to: **Highly Erodible Land (HEL)** means land defined as highly erodible land in Schedule A and includes both coastal highly erodible land and hillcountry highly erodible land.

Amend definition of Hillcountry highly Erodible Land to: **Hillcountry Highly Erodible Land** means land defined as hillcountry highly erodible land in Schedule A.

Add a definition of cultivation; **Cultivation** means the preparation of land for the purpose of growing annual crops or establishing pasture and any land disturbance associated with the planting, tending and harvesting of those crops.

See the section of this report which relates to Policy 5-3 for the proposed new wording of ‘Vegetation clearance’.

Amend the definition of ‘Property’ to: **Property** refers to one or more allotments as contained in a single certificate of title, and includes all adjacent land that is in the same ownership. Land is considered to be adjacent if it is only separated by a legal road. A legal road is considered a property for the purposes of this Plan.

APPENDIX A – PROPOSED DEFINITION OF HEL

Schedule A: Definition of Coastal Highly Erodible Land and Hill Country Highly Erodible Land

Rock types used in this definition are defined by their descriptions in Rock Type Classification for the NZ Land Resource Inventory, I H Lynn & T F Crippen, Manaaki Whenua Press. 1991.

Reference to a waterway in this definition means a permanently flowing waterway or an intermittently flowing waterbody which has a discernable channel which flows for at least 1 month a year.

Coastal Highly Erodible Land (CHEL) means an area of land greater than 50m by 50m within 5 kilometres of the coast that has a sandy textured topsoil or that is exposed sand after having the topsoil removed. A sandy texture feels gritty to the touch rather than smooth and a moistened lump will not leave staining on your hand.

Hill Country Highly Erodible Land (HHEL) means land that is:

1) Actively eroding

Active erosion can be recognised by:

- Ø Shallow small landslides (less than 1.5m deep) where:
 - 10% or more of the hill surface is slip scaped without woody vegetation OR
 - 5% of more of the hill surface is slip scaped without woody vegetation discharging directly into a waterway
- Ø Deep landslides (more than 1.5m deep) where:
 - 5% or more of the hill surface is slip scaped without woody vegetation OR
 - 3% of more of the hill surface is slip scaped without woody vegetation discharging directly into a waterway
- Ø Slumps and earthflows where:
 - 10% or more of the hill surface is recently erosion-disturbed ground (cracked or bare) OR
 - 5% of more of the hill surface is recently erosion-disturbed ground (cracked or bare) discharging directly into a waterway

Ø Gully erosion where:

- Bare gully-heads and sides are over 1m deep and 4m by 4m in area.

OR

2) On a Soft Rock area with a slope over 25°

A soft rock area can be recognised as an area of land which covers more than 50m horizontal by 50m up/downhill with an average slope of 25° where the rock is comprised of such materials as jointed or frittered mudstone, banded mudstone, crushed argillite, moderately consolidated or unconsolidated sandstone. Slope is calculated based on the 50m up/down hill transect within the area that work is being undertaken that results in the highest measured average slope.

OR

3) On a Hard Rock area with a slope over 35°

A hard rock area is an area of land which covers more than 100m horizontal by 100m up/downhill with an average slope of 35° where the rock is comprised of such materials as limestone or greywacke. Hard rocks can be recognised by their ability to produce gravel in streams. Hard rocks won't break with a medium hammer blow. Slope is calculated based on the 100m up/down hill transect within the area that work is being undertaken that results in the highest measured average slope.

OR

4) On a Medium Rock area with a slope over 25°

A medium rock area is an area of land which covers more than 100m horizontal by 100m up/downhill with an average slope of 25° where the rock is comprised of materials other than those mentioned in the above soft rock and hard rock categories. Slope is calculated based on the 100m up/down hill transect within the area that work is being undertaken that results in the highest measured average slope.

