

BEFORE THE MANAWATU-WANGANUI REGIONAL COUNCIL

In the matter of the Resource Management Act 1991

and

In the matter of Submissions and further submissions made by
TRUSTPOWER LIMITED to the Manawatu-
Wanganui Regional Council on the Proposed Horizons
One Plan – Land Provisions.

STATEMENT OF EVIDENCE OF ROBERT JOHN SCHOFIELD
Environmental Planner

30 June 2008

Introduction

- 1.1 My name is Robert John Schofield, and I am a Senior Principal of Boffa Miskell Limited, a national firm of consulting planners, ecologists and landscape architects. I hold the qualifications of BA (Hons) and Master of Regional and Resource Planning (Otago). I am a Member of the New Zealand Planning Institute, and a Past President (1998-2000). I have been a planning consultant based in Wellington for over 23 years, providing consultancy services for a wide range of clients around New Zealand, including local authorities, land developers, and the infrastructure and power sectors.
- 1.2 My experience includes the writing and preparation of Plan Changes for Councils and private clients, as well as work on the preparation of District and Regional Plans, including formulating provisions for infrastructure and energy development and distribution.
- 1.3 In this matter, I have been commissioned by TrustPower Limited ('TrustPower') to prepare its submissions on the proposed One Plan and to present planning evidence on its points consistent with the purpose and principles of the Resource Management Act 1991 ('RMA'). I have worked closely with both TrustPower and with other generators as part of my involvement in submissions on the proposed One Plan.
- 1.4 In preparing my evidence, my approach was to:
- Consider the provisions of the proposed One Plan of consequence to TrustPower, having regard to the purpose and principles of the RMA and other relevant national policies and strategies; and
 - Recommend appropriate changes that would give effect to the amendments requested by TrustPower in a way that is consistent with the RMA and my duties as an independent planning expert.
- 1.5 I have been engaged by TrustPower to provide an analysis of the proposed One Plan in terms of the relevant statutory considerations and obligations, taking into account those issues raised by TrustPower in relation to Land. I do not intend to address many of the matters of other submitters' concerns in TrustPower's submission in detail, unless specifically relevant. Rather, the purpose of my evidence is to review the principal matters of concern to TrustPower within the Chapter on Land against the purpose and principles of the RMA and good planning practice.
- 1.6 My evidence takes into account the section 42A report recommendations on the Land-related provisions of the proposed One Plan.
- 1.7 My evidence is structured according to the following format:
- Statutory considerations, particularly the purpose and principles of the RMA.
 - An analysis of the section 42A report's recommendations into the submissions and further submissions on the proposed One Plan as they relate to the concerns of TrustPower.
- (i) I have read the Code of Conduct for Expert Witnesses issued as part of the Environment Court Practice Notes. I agree to comply with the code and am satisfied

the matters I address in my evidence are within my expertise. I am not aware of any material facts that I have omitted that might alter or detract from the opinions I express in my evidence.

2 Primary Issues for TrustPower

- 2.1 As outlined in its primary submission, TrustPower generally supports the intent of the proposed One Plan, which seeks to ensure an integrated approach to resource management in the Manawatu-Wanganui Region. In a large measure, TrustPower either supports or does not oppose the general direction and approach of the One Plan. However, the proposed One Plan introduces a number of changes to policy that have the potential to adversely affect the ability to maintain and enhance effective and efficient electricity generation within the Region.
- 2.2 For this hearing on those provisions relating to Land, TrustPower is concerned that the proposed One Plan does not fully and satisfactorily recognise and take into account the local, regional and national benefits of renewable energy generation through specific objectives, policies and methods that are consistent with sections 5 and 7 of the RMA or with recent Government policy in relation to renewable energy.
- 2.3 To address these matters, I agree with TrustPower that some amendments should be made to the proposed One Plan, and I have advised the company on the form and detail of such changes that are appropriate in my opinion. In summary, the relief sought by TrustPower and the changes that I am recommending seek to ensure that the provisions contained in the proposed One Plan provide the appropriate recognition of resource activities and uses through a balanced approach to achieving sustainable management.

3 The Proposed One Plan – Land Provisions

- 3.1 First, I would note that if any matter raised in TrustPower's submission is not discussed in my evidence, then it should be inferred that I agree with the relevant recommendations in the section 42A report. In particular, I support retaining all provisions of the proposed One Plan that recognise the importance of energy generation in enabling people to provide for their wellbeing.
- 3.2 To assist the Committee, I have attached as Appendix 1 a summary table of TrustPower's submissions and further submissions, whether the officer's recommendation is to accept or reject these submissions and my comments on the recommendations - in respect of the provisions on Land.

Recommendation Land 1

Chapter 5 - General

- 3.3 In general, TrustPower is supportive of a number of the section 42A report's recommendations as they relate to TrustPower's submissions. Most importantly for the Land Chapter, TrustPower supports the recommendation to delete Schedule A and amend the related definitions. This matter is discussed in my evidence below.

- 3.4 In terms of TrustPower’s current and future interests in the region, I support the section 42A report’s recommendations to amend a number of objectives and policies to enable other activities on highly erodible land, subject to appropriate management plans.¹ As I will discuss later in my evidence, I share TrustPower’s strong support for the use of such plans which is consistent with developing best practice as to the management of its activities.

Recommendation Land 7

Chapter 5 - Objective 5-1 Accelerated Erosion

- 3.5 I have some concerns regarding the broad brush rejection by the section 42A report of a number of submissions seeking to amend the proposed One Plan to replace the word ‘minimised’ with ‘avoided, remedied or mitigated.’² I consider that the general use of this term throughout the proposed One Plan is important and warrants some general discussion to justify and ensure its consistent application.
- 3.6 For the purposes of this hearing, I share TrustPower’s and other submitters’ concerns that the use of the term ‘minimise’ in the context of objectives can be highly subjective, and potentially have a meaning that was not intended by the policy-makers. As a general rule, I consider that the use of this term should only occur in the context of “best practicable option”, rather than the generic management of adverse effects. Otherwise, the term ‘minimise’ is commonly understood to mean ‘to reduce as much as possible’, which is not the same as ‘avoid, remedy or mitigate’. I seek that this reference and other relevant uses of this term be replaced with the terms ‘avoid, remedy or mitigate’ consistent with sustainable management (as defined in section 5) and the intent of Part II of the RMA.
- 3.7 In summary, in relation to Objective 5-1, TrustPower seeks:
- (a) **That the term ‘minimised’ be replaced with the terms ‘avoided, remedied or mitigated’.**

Recommendation Land 10

Chapter 5 - Policy 5-3 Regulation of vegetation clearance and land disturbance on highly erodible land

Policy 5-3(b) - Use of the word ‘significantly’

- 3.8 The submission of Water & Environmental Care Association Inc and TrustPower’s further submission³ sought the deletion of the term “significantly” in the context of Policy 5-3. This relief was rejected by the section 42A report, noting in particular on page 110 that deleting the word ‘significantly’ from Policy 5-3(b) would remove the capacity for activities to occur that may cause adverse effects albeit minor adverse effects. I have some reservations with the use of this subjective term given the large area of highly erodible land identified in the Manawatu-Wanganui region. When one considers the large areas across the region that fits within the all-encompassing definition of ‘highly erodible land’, I consider it would be more appropriate to include some criteria as to this ‘significant increase’.

¹ Refer submissions 363-54 and X 511-124

² Refer submissions 359-36 and X 511-126 as examples

³ Refer submissions 311 16 and X 511 134 respectively

Policy 5-3(a) – reference to infrastructure

- 3.9 I support the officer’s recommended amendment to Policy 5-3(a) to add a new subclause (vii) to clarify that the infrastructure referred to is infrastructure of regional and national importance as defined in Policy 3-1(a) and that the vegetation clearance and land disturbance activity is for the purposes of establishing or maintaining this infrastructure.⁴ The section 42 report’s recommendation to include in the Glossary definition of ‘vegetation clearance’ specific exclusions for vegetation clearance undertaken for the maintenance of infrastructure of regional and national significance to give effect to this change in Policy 5-3 is also supported.

Role of environmental management plans

- 3.10 TrustPower supported Mighty River Power’s submission⁵ seeking to recognise the role that environmental management plans play in avoiding, remedying or mitigating adverse effects. Because these submissions were rejected by the section 42A officer’s report without any substantive discussion, I would like to reiterate to the Committee the importance of these voluntary documents and the role they play in setting high benchmarks for best practice. On this matter, I would like to reaffirm to the Committee Horizon’s stated principles that the One Plan will ‘*embrace a more non-regulatory approach*’ and promote a ‘*permissive regulatory approach*’ – through industry self regulation and use of Codes of Practice.⁶
- 3.11 One Plan’s principle of industry self-regulation is an important point – and one that is consistent with TrustPower’s original and further submissions. My experience is that the development of environmental management plans by industry and the subsequent practices employed in implementing these documents means that they are often more effective in avoiding, remedying or mitigating adverse effects than through regulatory controls; in many cases exceeding council or NZ Standards best practice. They also often provide a more effective means of pursuing an integrated approach to managing issues.
- 3.12 In summary, in relation to Policy 5-3, TrustPower seeks:
- (a) **In 5-3(b), delete the term ‘significantly’ or include appropriate criteria to determine what constitutes a ‘significant increase’ in the context of highly erodible land;**
 - (b) **In 5.3(a), insert a new subclause to clarify that the infrastructure referred to is infrastructure of regional and national importance as defined in Policy 3-1(a) and that the vegetation clearance and land disturbance activity is for the purposes of establishing or maintaining this infrastructure is retained; and**
 - (c) **In 5-3(a), insert a new subclause that recognises the role that environmental management plans play in avoiding, remedying or mitigating adverse effects from erosion.**

⁴ Refer submission 358 24

⁵ Refer submissions 359 37 and X 511-129

⁶ Refer page 14 of Helen Marr’s ‘Planning Evidence and Recommendations Report’ for the Overall Plan, May 2008

Recommendation Land 12

Chapter 5 - Policy 5-5 Codes of practice and best management practices

- 3.13 As outlined above in relation to Recommendation Land 10, I support the use of industry codes of practice and best management practices. However, I am concerned that much of the section 42A report discussion was solely in relation to the use of codes of practice, as opposed to the use of best management practices. Without getting into more detail here, I reiterate to the Committee my earlier comments in paragraphs 3.10 and 3.11 above in relation to the use of environmental management plans. Similarly to the recommendations on Policy 5-3, I consider the section 42A report has only cursorily investigated the potential of these documents.
- 3.14 Also as outlined in the submission of Forest & Bird and supported by TrustPower,⁷ the development of these codes of practice or best management practices provide a good opportunity for non-industry involvement in these matters. Such involvement provides opportunities for both industry and non-industry to improve and share their evolving knowledge on such matters to keep these plans and codes at the leading edge of best practice.
- 3.15 In summary, in relation to Policy 5-5, TrustPower seeks:
- (a) **Amend 5-5(a), as follows (new text in underline): ‘The development of code of practice, best-practice environmental management plans, and other sector-based initiatives targeted at achieving sustainable land use will be supported.’**
 - (b) **Amend 5-5(b), as follows (new text in underline): ‘Where possible, appropriately developed and administered codes of practice and best-practice environmental management plans targeted at achieving sustainable land use will be recognised and incorporated within the regulatory framework.’**

Recommendation Land 19

Chapter 5 - Method Infrastructure Protection

- 3.16 TrustPower originally sought that Method 5.5 ‘Infrastructure Protection Project’ be amended to include reference to renewable energy development.⁸ I am satisfied with the reasons in the section 42A report’s recommendation to reject this relief, but ask that Council make a concerted effort to recognise the role of renewable energy generation in this Method, particularly wind power which has the ability to use land for both primary production and the production of energy.
- 3.17 The Infrastructure Protection Project Method could be an excellent tool to help meet New Zealand’s goal of recognising and providing for the benefits of renewable energy generation. In my opinion, it would be fully appropriate and helpful to include such methods where the development and use of the Region’s natural resources would have significant regional or national benefits, particularly where such benefits are in accordance with matters of importance under the RMA.
- 3.18 In summary, in relation to the Method: Infrastructure Project, TrustPower seeks:

⁷ Refer submissions 460 21 and X 511 141 respectively

⁸ Refer submission 358 26, supported by X 525 237

- (a) **Amend the Infrastructure Protection Project Method as follows (new text in underline): “Advice and information will be provided to infrastructure* owners, particularly infrastructure projects of the national or regional importance, in the planning stages of new works, the carrying out of maintenance, and protection of existing networks from erosion risks.”**

Recommendation Land 22

Chapter 5 - Explanations and Principal Reasons

- 3.19 I am concerned at the section 42A report’s rejection of TrustPower’s submission seeking that Section 5.7 include reference to alternative low impact land uses such as windfarms or providing for renewable energy.⁹ Although I acknowledge that Section 5.7 is focused on sustainable landuse and minimising erosion associated with farming practices, I consider it appropriate to include reference to other land uses that achieve this goal, particularly those land uses that have a range of other benefits.
- 3.20 On this matter, I remind the Committee that the ability to use land for both primary production and the production of energy is clearly an efficient use of that land resource, as has been recently established by the Environment Court.¹⁰ Further, the ability to decommission wind farms means they are more able than other generation methods to sustain the ability of natural and physical resources to meet the reasonably foreseeable needs of future generations. I concur with TrustPower that this section is an appropriate place to include such material in a manner that does not require fundamental changes to the proposed One Plan.
- 3.21 In summary, in relation to the Chapter 5 Explanations and Principal Reasons, TrustPower seeks:
- (a) **Amend 5.7 to include reference to the benefits of alternative low impact land uses such as windfarms or providing for renewable energy on areas of highly erodible land.**

Recommendation Land 27

Chapter 12 - Policy 12-3 Important and essential activities

- 3.22 I support the section 42A report’s recommendation to accept in part TrustPower’s submission seeking the inclusion of the provision of infrastructure of regional and national importance as defined in Policy 3-1.¹¹ I consider explicit inclusion recognises the benefits of such infrastructure and acknowledges that developing and maintaining such infrastructure can have significant effects that may not be able to be avoided, remedied or mitigated.
- 3.23 In summary, in relation to the Policy 12-3, TrustPower seeks:
- (a) **That the reference to the provision of infrastructure of regional and national importance as defined in Policy 3-1 be made more explicit as per the section 42A report’s recommendation as follows: “The Regional Council will generally allow vegetation clearance* or land disturbance***

⁹ Refer submission 358 27, supported by Genesis X 525 238

¹⁰ *Meridian Energy Limited v Wellington City Council*, W031/2007 at paragraph [370].

¹¹ Refer submission 358 74; supported by X 522 304 and supported in part by X 525 230

associated with the provision of infrastructure of regional and national importance (as defined in Policy 3-1) and natural hazard management.”

Recommendation Land 30

Chapter 12 - Rule General

- 3.24 TrustPower originally sought either the deletion of Rules 12-1 to 12-8 from the proposed One Plan or that these rules be amended to include specific reference to infrastructure and energy development in the classification criteria.¹² The section 42A report rejected TrustPower’s submission, stating that 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. The section 42A evaluation also stated that to make specific reference to activities such as ‘infrastructure and energy development’ within this column would not be relevant or necessary.
- 3.25 TrustPower is opposed to this relief and I am concerned at the cursory evaluation of TrustPower’s submission. However, rather than dwell on these matters here, the evidence below and to follow as part of the Biodiversity Hearing Topic will address those relevant Rules 12-1 to 12-8 in more detail.

Recommendation Land 31

Chapter 12 - Rule 12-1 Vegetation clearance and land disturbance not covered by other rules

- 3.26 TrustPower supported the submission of Meridian Energy that renewable energy development be a permitted activity.¹³ Although the section 42A report rejected this submission, the subsequent evaluation went on to state that 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 proposed One Plan, those activities can be included in the proposed One Plan as permitted activities. As per my comments in relation to Recommendation Land 10, I concur with both TrustPower and Meridian that there is scope for these potential adverse effects to be suitably managed through best practice industry techniques and the development of environmental management plans.
- 3.27 On the matter of the permitted levels of vegetation clearance and land disturbance, TrustPower supported the submission of Federated Farmers¹⁴ that this rule alternately exclude vegetation clearance and land disturbance that is carried out in accordance with a Whole Farm Business Plan or land management practices that will reduce the effects of accelerated erosion.
- 3.28 In summary, in relation to Rule 12-1, TrustPower seeks:
- (a) Either renewable energy development be included as a permitted activity;**
 - or**
 - (b) That Rule 12-1 be amended to exclude vegetation clearance and land disturbance undertaken in accordance with the use of best practice land management practices.**

¹² Refer submission 358 76; supported in part by X 522 228 and X 522 309

¹³ Refer submission 363 143; supported by X 511 397

¹⁴ Refer submission 426 132; supported by X 511 399

Recommendation Land 33

Chapter 12 - Rule 12-3 Land Disturbance

- 3.29 Given that the proposed One Plan states that 65% of the Manawatu-Wanganui Region consists of highly erodible hillsides and gullies,¹⁵ I consider TrustPower was justified in supporting those submissions which sought to delete Rule 12-3¹⁶ or amend Rule 12-3 to classify renewable energy development as a permitted activity where a renewable energy development plan is submitted to the Council.¹⁷
- 3.30 I would like to point out to the Committee my concern at the elevated status provided to Whole Farm Business Plans throughout the proposed One Plan, particularly in the Rules. As I have outlined earlier in this evidence, I consider the development of environmental management plans to manage the potential adverse effects of infrastructure development to be consistent with or in many cases to actually exceed Council or industry best practice. Accordingly, I consider the often ‘multi-disciplinary’ approach employed by industry needs greater recognition, similar to the weight given by the proposed One Plan to Whole Farm Business Plans.
- 3.31 I wish to comment further on the section 42A report statement that “*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.*” While I agree with this comment, in my opinion, provision for activities that are carried out in accordance with yet to be developed environmental management plans (which will be established in consultation with regulatory authorities and have regard to industry best practice techniques) does not offend the RMA requirements relating to the incorporation of external documents by reference. As I understand those provisions are generally directed more toward nationally and internationally recognised standards, requirements or recommended practices. TrustPower’s submission seeks only to achieve the same status for environmental management plans which presently applies in the proposed plan to the Whole Farm Business Plans.
- 3.32 In summary, in relation to Rule 12-3, TrustPower seeks:
- (a) **Either delete Rule 12-3 or amend Rule 12-3 to classify renewable energy development as a permitted activity; or**
 - (b) **Elevate renewable energy development environmental management plans or industry best practice techniques to a similar status as Whole Farm Business Plans; or**
 - (c) **Amend the matters of control to include renewable energy development environmental management plans or industry best practice techniques.**

Recommendation Land 34

Chapter 12 - Rule 12-4 Vegetation clearance

- 3.33 I support the section 42A report recommendation to accept the Horizons submission to amend the classification of this rule from discretionary to restricted discretionary and add matters of discretion. I consider the revised matters of discretion are largely

¹⁵ Refer page 5-10 of the proposed One Plan

¹⁶ Refer submission 426 135; supported by X 511 402

¹⁷ Refer submission 363 145; supported by X 511 400

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 also support the section 42A report recommendation to include an additional exclusion from Rule 12-4 for the purposes of maintaining existing infrastructure.

- 3.34 Nonetheless, despite supporting this recommended change in activity status, TrustPower is justified in being concerned that the submissions it supported in relation to including specific reference to renewable energy generation activities have been rejected.¹⁸ Similar to TrustPower's earlier concerns in relation to Recommendation 33 above, the section 42A report noted that such activities may be able to be undertaken in the future as permitted activities where appropriate codes of practice or standards are implemented. As I have just elaborated in relation to Recommendation 33, I consider some exception for renewable energy development is justified in relation to vegetation clearance rules so long as this is undertaken in a manner that includes full consideration of actual and potential effects on the environment.
- 3.35 Also on Rule 12-4, I share TrustPower's concern with the section 42A report recommendation to accept the Minister of Conservation submission¹⁹ to include reference to 'at-risk' habitats as part of the conditions. I am concerned that inclusion of this term inappropriately elevates the importance and ecological significance of these habitats. This matter will be discussed in more detail in TrustPower's evidence on the Biodiversity related provisions of the proposed One Plan.
- 3.36 In summary, in relation to Rule 12-4, TrustPower seeks:
- (a) **Either that the classification of Rule 12-4 be amended from discretionary to restricted discretionary activity status and matters of discretion be added in relation to renewable energy development; or**
 - (b) **That the classification of Rule 12-4 be amended from discretionary to controlled activity status and include as a matter of control the development of renewable energy environmental management plans or industry best practices; or**
 - (c) **That an exception for renewable energy development be included; and**
 - (d) **That reference to 'at-risk habitats' are excluded from Rule 12-4.**

Recommendation Land 35

Chapter 12 - Rule 12-5 Vegetation clearance and land disturbance on coastal foredunes and near waterbodies

- 3.37 TrustPower is concerned that the application of proposed Rule 12-5 could restrict a large area of future potential for energy generation in the Manawatu-Wanganui Region. Accordingly, TrustPower supported the submission of Meridian Energy to classify vegetation clearance and land disturbance associated with renewable energy

¹⁸ Refer submission 363 148; supported by 511 404

¹⁹ Refer submission 372 135; opposed by X 511 406

generation facilities as a permitted activity.²⁰ For those reasons outlined in Recommendation Land 34 above, I do not support the rejection of this submission.

3.38 However, in relation to Rule 12-5, I do support the section 42A officer's report recommendation to enable land disturbance associated with the maintenance of artificial watercourses such as farm drains and the specific exclusions relating to these activities as permitted activities. The recommended changes to clause (b) and subclause (b)(i) of Rule 12-5 are also supported for the clarification they provide.²¹

3.39 In summary, in relation to Rule 12-5, TrustPower seeks:

- (a) **Either that the classification of Rule 12-5 be amended to classify vegetation clearance and land disturbance associated with renewable energy generation facilities as a permitted activity; or**
- (b) **That the classification of Rule 12-5 be amended from discretionary to controlled activity status and include as a matter of control the development of renewable energy environmental management plans or industry best practices; and**
- (c) **That land disturbance associated with the maintenance of artificial watercourses such as farm drains and the specific exclusions relating to these activities be classified as permitted activities.**

Recommendation Land 37

Schedule A

3.40 The section 42A officer's report recommendations in relation to Schedule A are largely supported.²² As noted by the section 42A report recommendations, the current map in Schedule A is at too large a scale to be useful to plan users and inadequate for the purposes of the proposed One Plan. Subject to the insertion of an appropriate definition, I support the section 42A recommendation to delete Figure A:1 from Schedule A and to add the definition of Highly Erodible Land attached to the section 42A report as Appendix A subject to any amendments proposed at the hearing.

3.41 In summary, in relation to Schedule A, TrustPower seeks:

- (a) **That Figure A-1 be deleted; and**
- (b) **That a more appropriate definition of Highly Erodible Land be developed in Schedule A in association with stakeholders.**

²⁰ Refer submission 363 149; supported by X 511 408

²¹ Refer submission 426 146; supported by X 511 411

²² Refer submission 358 142 and other submissions supported by TrustPower, including X 511 553

Recommendation Land 38

Glossary terms – Land

Definition of Gully

- 3.42 I note that the section 42A report did not include a recommendation in the table on Page 308 in relation to TrustPower’s submission²³ seeking the deletion of the term ‘Gully’ and any references to this term from the proposed One Plan, yet the recommendation on page 336 rejected submissions requesting to remove definition of gully. As noted by the Officer’s report, I consider it is more appropriate to address this matter point following receipt of the officer’s report for the Biodiversity Hearing Topic.²⁴
- 3.43 In summary, in relation to the Glossary Terms - Land, TrustPower seeks:
- (a) **That the definition of ‘Gully’ and any reference to this term be deleted from the proposed One Plan.**

Definitions of ‘Highly Erodible Land’

- 3.44 In general, I support the section 42A report’s recommendation to alter the definitions of ‘Highly Erodible Land (HEL)’, ‘Hillcountry Highly Erodible Land’ and ‘Coastal Highly Erodible Land’ and to amend each of these definitions to refer directly to the definition in Schedule A.²⁵
- 3.45 Given the large area of potentially highly erodible land in the region, TrustPower is supportive of the use of pre-hearing meetings with stakeholders specifically to define these terms. TrustPower is also generally supportive of the section 42A report recommendations in relation to these terms and the use of the Rock Type Classification for the NZ Land Resource Inventory (I H Lynn & T F Crippen, Manaaki Whenua Press, 1991) as part of the rock types used in this definition. However, as outlined in the section 42A officer’s report, I note that there are still some matters that require resolution, primarily surrounding the method by which ‘active erosion’ is identified and calculated as part of this definition. TrustPower reserves final judgement on these definitions until such time as they are finalised.
- 3.46 In summary, in relation to the Glossary Terms - Land, TrustPower seeks:
- (a) **That the definitions of ‘Highly Erodible Land (HEL)’, ‘Hillcountry Highly Erodible Land’ and ‘Coastal Highly Erodible Land’ be amended and that these definitions refer directly to the definition in Schedule A.**

Inclusion of Relevant Terms from the Resource Management Act

- 3.47 TrustPower supported the submissions of Horticulture NZ²⁶ and Federated Farmers of NZ Inc.²⁷ that relevant definitions from the RMA be included in the One Plan so that users have ready access to all necessary terms. While these submissions were

²³ Refer submission 358 137

²⁴ Refer page 335 of the officer’s report

²⁵ Refer TrustPower submissions 358 138, 358 139, and further submissions X 511 543, X 511 547, X 511 549, X 511 550

²⁶ Refer submissions 357 3 and X 511 532

²⁷ Refer submissions 426 215 and X 511 537

rejected by the section 42A officer's report, I support the officer's recommendation as part of the Overall Plan hearing report that there be a clear statement at the beginning of the glossary to the effect that words and terms used and defined by the RMA have the same meaning as in that Act and that they are not repeated in the One Plan glossary.

3.48 In summary, in relation to the Glossary Terms - Land, TrustPower seeks:

(a) That there be a clear statement at the beginning of the Glossary to the effect that words and terms used and defined by the RMA have the same meaning as in that Act and that they are not repeated in the One Plan Glossary.

4 Conclusion

4.1 In conclusion, I support the overall intent and approach of the One Plan to provide a strong framework for promoting the integrated management of the Region's natural and physical resources, focusing on key regional assets and issues. In particular, the recognition of the region's infrastructural and energy generation assets within the Plan is supported.

4.2 However, given the large proportion of the Manawatu-Wanganui Region that is classified as highly erodible hillsides and gullies, the One Plan should contain a more appropriate level of recognition of, and provision for, renewable energy generation. It is vital that those provisions of the One Plan as they relate to land need to recognise the regional and national significance of this resource use, and the Region's contribution to their national benefits, consistent with purpose and principles of the RMA.

4.3 Accordingly, I would recommend that the relief sought by TrustPower be accepted, according to the manner outlined in my evidence.



Robert Schofield
Senior Principal, Boffa Miskell Limited | Environmental Planner
30 June 2008

**APPENDIX 1: Horizons Proposed One Plan - Land
Summary of primary and further submissions of TrustPower Limited**

Submitter number	Relief Sought	Officer's recommendation	Comments on Staff Recommendation
Recommendation Land 1 Chapter 5 General			
426 23 Fed Farmers X 511 125 (Support)	Delete the word damage and replace with adverse environmental effects, throughout the chapter and a consequential amendment throughout the plan.	Reject 426 23 Reject X 511 125	Support in part, subject to appropriate justification
272 13 Power Co X 511 122 (Oppose)	Chapter 5 objectives and policies to remain unchanged.	Accept in part 272 13 Accept in part X 511 122	Support in part, subject to comments below
363 53 Meridian Energy (MEL) X 511 123 (Support)	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.	Accept in part 363 53 Accept in part X 511 123	Support
363 54 MEL X 511 124 (Support)	Amend the objectives and policies to enable other activities on highly erodible land, subject to appropriate management plans.	Accept in part 363 54 Accept in part X 511 124	Support
Recommendation Land 7 Chapter 5 Objective 5-1 Accelerated Erosion			
359 36 Mighty River Power (MRP) X 511 126 (Support)	Amend Objective to replace the word 'minimised' with 'avoided, remedied or mitigated.'	Reject 359 35 Reject X 511 126	Oppose, amend as per relief sought
Recommendation Land 8 Chapter 5 Policy 5-1 Sustainable Management of highly erodible land – whole farm business plans			
359 35 MRP X 511 127 (Support)	Recognise the role that environmental management plans play in avoiding, remedying or mitigating adverse effects from erosion.	Accept in part 359 35 Accept in part X 511 127	Support in part
Recommendation Land 10 Chapter 5 Policy 5-3 Regulation of vegetation clearance and land disturbance on highly erodible land			
268 21 Genesis X 511-1128 (Oppose)	Retain Policy 5-3	Accept 268 21 Reject X 511 128	Oppose, seek amendments
311 16 Water & Environment Care X511 134 (Support)	Delete "significantly."	Reject 311 16 Reject X 511 134	Oppose, seek deletion of the term 'significantly' or the inclusion of appropriate criteria to determine what constitutes a 'significant increase' in the

Submitter number	Relief Sought	Officer's recommendation	Comments on Staff Recommendation
			context of highly erodible land.
358 23 TrustPower (TPL) X 522 131 MEL (Support in part)	Either insert an additional Policy 5-3 provision (a)(iii) as follows: <i>(iii) the activity is for the purpose of establishing or maintaining infrastructure and development of energy generation facilities.</i> 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 generation. 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 358 23 Accept in part X 522 131	Support
358 24 TPL X 522 132 MEL (Support in part)	Amend Policy 5-3(b) to include: <i>or land instability, except for temporary construction activities in relation to creating and maintaining infrastructure and renewable energy developments.</i> 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 358 24 Accept in part X 522 132	Oppose, seek insertion of a new subclause to clarify that the infrastructure referred to is infrastructure of regional and national importance as defined in Policy 3-1(a) and for the purposes of establishing or maintaining this infrastructure is retained.
359 37 MRP X 511 129 (Support)	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: <i>(iii) The activity is for the purpose of establishing or maintaining a fence Line.</i>	Reject 359 37 Reject X 511 129	Oppose, seek recognition of the role of environmental management plans.
359 38 MRP X 511 130 (Support)	Insert a new point (v) as follows and renumber existing (v) as (vi): <i>(v) The activity is for the purpose of establishing and maintaining infrastructure and a comprehensive environmental management plan has been submitted to the Council.</i>	Accept in part 359 38 Accept in part X 511 130	Support in part
363 55 MEL X511 131 (Support)	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 follows: <i>The activity is for the purpose of establishing or maintaining a renewable energy generation facility in accordance with a renewable energy development plan.</i> Any consequential amendments necessary to give effect to this	Reject 363 55 Reject X 511 131	Oppose, seek recognition of the role of environmental management plans.

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363 56 MEL X 511 132 (Support)	Meridian opposes in part Policy 5-3 and seeks the following amendments or similar: Amend clause (a)(iii) to delete the words: <i>"and there is no reasonable alternative location"</i> . Any consequential amendments necessary to give effect to this submission	Reject 363 56 Reject X 511 132	Support
363 57 MEL X 511 133 (Support)	Meridian opposes in part Policy 5-3 and seeks the following amendments or similar: Amend clause (b) as follows: <i>(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.</i> Any consequential amendments necessary to give effect to this submission	Reject 363 57 Reject X 511 133	Oppose, seek recognition of the role of environmental management plans.
372 23 DOC X 511 135 (Oppose)	Retain policy as written.	Accept in part 372 23 Reject X 511 135	Oppose, as above
426 32 Fed Farmers X 511 136 (Support)	Delete Policy 5.3. Re-draft to state the effects of accelerated erosion which are to be avoided on highly erodible land.	Reject 426 32 Reject X 511 136	Oppose, as above
Recommendation Land 11 Chapter 5 Policy 5-4 Regulation of significant disturbance on land that is not highly erodible land			
357 51 Horticulture NZ X 511 139 (Support)	Decision Sought: Amend Policy 5-4 by adding 'Significant' at the commencement of the policy.	Reject 357 51 Reject X 511 139	Support in part, inclusion of the term significant in this context may be appropriate
358 25 TPL	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 358 25	Support in part
359 39 MRP	Retain policy as notified.	Accept in part 359 39	Support in part

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X 511 137		Accept in part X 511 137	
426 33 Fed Farmers X 511 138 (Oppose)	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 426 33 Reject X 511 138	Support in part
Recommendation Land 12 Chapter 5 Policy 5-5 Codes of practice and best management practices			
359 40 MRP X 511 140 (Support)	Retain policy as proposed.	Accept 359 40 Accept X 511 140	Support, subject to changes in relation to codes of practice and other sector-based initiatives.
426 34 Fed Farmers X 511 142 (Support)	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 426 34 Reject X 511 142	Oppose, seek amendment of Policy 5-5 to include information on the development of codes of practice and other sector-based initiatives.
460 21 Forest & Bird X 511 141 (Support)	Support all but advocate non-industry involvement in the development of codes of practice.	Accept in part 460 21 Accept in part X 511 141	Support in part, as above
Recommendation Land 19 Chapter 5 Method Infrastructure Protection			
268 22 Genesis X 511 144 (Support)	Retain Method 5-5 Infrastructure Protection.	Accept 268 22 Accept X 511 144	Support
358 26 TPL X 525 237 Genesis (Support)	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 358 26 Reject X 525 237	Support in part, but request that in undertaking the Infrastructure Protection Project, Council works with the energy development sector.
359 41 MRP X 511 145 (Support)	Retain Infrastructure Protection method	Accept 359 41 Accept X 511 145	Support, as above
Recommendation Land 21 Chapter 5 Anticipated Environmental Results Table Row 1			
372 26 DOC X 511 143 (Support)	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	Reject 372 26 Reject X 511 143	Support

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	clarity standards in Schedule D with 'minimum standards to be achieved by 2012 and 2017 for rivers which do not currently meet the standards.		
Recommendation Land 22 Chapter 5 Explanations and Principal Reasons			
358 27 TPL X 525 238 Genesis (Support)	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 358 27 Reject X 525 238	Oppose, seek amendment to include reference to the benefits of alternative low impact land uses or providing for renewable energy on areas of highly erodible land.
Recommendation Land 25 Chapter 12 Policy 12-1 Consent decision-making for vegetation clearance and land disturbance			
357 107 Horticulture NZ X 511 387 (Oppose)	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 357 107 Accept X 511 387	Support
359 95 MRP X 511 383 (Support)	Retain the reference to Chapter 3 in (i) of the policy.	Accept 359 95 Accept X 511 383	Support
359 96 MRP X 511 384 (Support)	Add a new sub clause to read as follows: The ability to remedy or mitigate adverse effects.	Accept in part 359 96 Accept in part X 511 384	Support
363 137 MEL X 511 385 (Support)	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 363 137 Reject X 511 385	Support
460 93 Forest & Bird X 511 386 (Oppose)	Submitter supports Policy 12-1 Consent decision-making for vegetation clearance and land disturbance	Accept 460 93 Reject X 511 386	Support subject to above amendments in relation to the term 'minimise'.
Recommendation Land 27 Chapter 12 Policy 12-3 Important and essential activities			
358 74 TPL X 522 304 MEL (Support in Part) X 525 230 Genesis (Support)	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).	Accept in part 358 74 Accept in part X 522 304 Accept in part X 525 230	Support reference to the provision of infrastructure of regional and national importance as defined in Policy 3-1 be made more explicit.

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	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.		
363 140 MEL X 511 389 (Support)	Meridian requests that sentence 2 of Policy 12-3 is amended as follows or similar: 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. Any consequential amendments necessary to give effect to this submission.	Reject 363 140 Reject X 511 389	Support
372 133 DOC X 511 392 (Oppose)	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 wellbeing of communities etc.	Accept in part 372 133 Reject X 511 392	Support in part, subject to section 42A recommendations being adopted.
426 128 Fed Farmers X 511 391 (Support)	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 426 128 Accept in part X 511 391	Support
460 95 Forest & Bird X 511 390 (Support)	Submitter supports Policy 12-3: Important and essential activities	Accept in part 460 95 Accept in part X 511 390	Support
Recommendation Land 28 Chapter 12 Policy 12-4 Large-scale consents			
268 32 Genesis X 511 393 (Support)	Retain Policy 12-4.	Accept 268 32 Accept X 511 393	Support
358 75 TPL X 501 195 Ernslaw One (Support) X 522 307 MEL (Support in part)	Retain Policy 12-4 as read. 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.	Reject 358 75 Reject X 501 195 Reject X 522 307	Support

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363 141 MEL X 511 394 (Support)	Meridian requests that Policy 12-4 is amended as follows or similar: Add a new condition as follows: <i>(c) renewable energy generation facilities</i> Any consequential amendments necessary to give effect to this submission	Reject 363 141 Reject X 511 394	Support
426 129 Fed Farmers X 511 395 (Oppose)	Amend 12-4 to read: <i>(c) agricultural land use activities</i>	Accept 426 129 Reject X 511 395	Support
Recommendation Land 30 Chapter 12 Rule General			
358 76 TPL X 492 198 DOC (Oppose) X 522 228 MEL (Support in Part) X 522 309 MEL (Support in Part)	Delete Rules 12-1 to 12-8 from the Proposed Plan or delete any reference to rare, threatened and at-risk habitats from Rules 12-1 to 12-8. Amend Rules 12-1 to 12-8 to include specific reference to infrastructure and energy development in the classification criteria. Amend the non-complying activity status of Rule 12-8 to become a discretionary activity. 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.	Reject 358 76 Accept X 492 198 Reject X 522 228 Reject X 522 309	Oppose, refer comments in relation to specific policies and as part of the Biodiversity Hearing Topic (Chapter 7).
Recommendation Land 31 Chapter 12 Rule 12-1 Vegetation clearance and land disturbance not covered by other rules.			
363 143 MEL X 511 397 (Support)	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.	Reject 363 143 Reject X 511 397	Oppose, seek Rule 12-1 is amended to include renewable energy development as a permitted activity
426 131 Fed Farmers X 511 398 (Support)	Delete Rule 12- 1	Reject 426 131 Reject X 511 398	Oppose
426 132 Fed Farmers X 511 399 (Support)	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 management practices that will reduce the effects of accelerated erosion" (or words to that effect).	Reject 426 132 Reject X 511 399	Oppose, seek Rule 12-1 be amended to exclude vegetation clearance and land disturbance undertaken in accordance with the use of best practice land management practices.

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Recommendation Land 33 Chapter 12 Rule 12-3 Land Disturbance			
363 145 MEL X 511 400 (Support)	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 363 145 Reject X 511 400	Oppose, seek either the deletion of Rule 12-3 or its amendment to classify renewable energy development as a permitted activity; or Elevate renewable energy development environmental management plans or industry best practice techniques to a similar status as whole farm business plans; or Amend the matters of control to include renewable energy development environmental management plans or industry best practice techniques.
426 135 Fed Farmers X 511 402 (Support)	Delete Rule 12- 3	Reject 426 135 Reject X 511 402	Oppose, as above
460 100 Forest & Bird X 511 401(Oppose)	Supports Rule 12-3: Land Disturbance.	Accept 460 100 Reject X 511 401	Oppose, as above
Recommendation Land 34 Chapter 12 Rule 12-4 Vegetation clearance			
363 147 MEL X 511 403 (Support)	Meridian opposes Rule 12-4 in its entirety and seeks its deletion. Any consequential amendments necessary to give effect to this submission.	Reject 363 147 Reject X 511 403	Oppose, seek either that the classification of Rule 12-4 be amended to restricted discretionary and matters of discretion be added in relation to renewable energy development; or That the classification of Rule 12-4 be amended to controlled activity and include as a matter of control the development of renewable energy environmental management plans or industry best practices; or That an exception for renewable energy development be included.
363 148 MEL X 511 404 (Support)	Meridian requests that renewable energy generation facilities are classified as a permitted activity as requested in its primary submission to	Reject 363 148 Reject X 511 404	Oppose, as above

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	Chapter 12. Any consequential amendments necessary to give effect to this submission.		
372 135 DOC X 511 406 (Oppose)	Add 'or any at-risk habitat after 'threatened habitat'.	Accept 372 135 No Section 42A report recommendation	Oppose, seek that reference to 'at-risk habitats' are excluded from Rule 12-4
426 141 Fed Farmers X 511 407 (Support)	Delete Rule 12- 4	Reject 426 141 Reject X 511 407	Oppose, as above
460 101 Forest & Bird X 511 405 (Oppose)	Supports Rule 12-4: Vegetation clearance.	Accept 460 101 Reject X 511 405	Oppose, as above
Recommendation Land 35 Chapter 12 Rule 12-5 Vegetation clearance and land disturbance on coastal foredunes and near waterbodies			
363 149 MEL X 511 408 (Support)	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 Meridian's primary submission to Chapter 12. Any consequential amendments necessary to give effect to this submission.	Reject 363 149 Reject X 511 408	Oppose, seek that either the classification of Rule 12-5 be amended to classify vegetation clearance and land disturbance associated with renewable energy generation facilities as a permitted activity; or That the classification of Rule 12-5 be amended from discretionary to controlled activity status and include as a matter of control the development of renewable energy environmental management plans or industry best practices.
372 136 DOC X 511 409 (Oppose)	Retain the rule as proposed.	Accept in part 372 136 Reject X 511 409	Oppose, as above.
426 145 Fed Farmers X 511 410 (Support)	Delete Rule 12- 5	Reject 426 145 Reject X 511 410	Oppose, as above.
426 146 Fed Farmers X 511 411 (Support)	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 426 146 Accept in part X 511 411	Support
426 147 Fed Farmers	Amend 12-5 as follows:	Reject 426 147	Support in part

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X 511 598 (Unknown)	<i>(b) (i) in areas where the land slope is between 0 and 150, within 10m 5 m of a Site of Significance - Aquatic</i>	Reject X 511 598	
426 148 Fed Farmers X 511 412 (Support)	Delete condition 12-5(b) (ii)	Reject 426 148 Reject X 511 412	Oppose, as above
426 149 Fed Farmers X 511 413 (Support)	Delete condition 12-5(c)	Reject 426 149 Reject X 511 413	Oppose, as above
Recommendation Land 37 Schedule A			
357 148 Horticulture NZ X 511 554 (Oppose)	Delete Coastal Erodible Land from Figure A.1.	Reject 357 148 Accept X 511 554	Support
358 142 TPL	Delete Schedule A from the Proposed Plan and any references to Schedule A elsewhere in the document. Any similar amendments to like effect. Any consequential amendments that stem from the amendment of Schedule A as proposed in this submission.	Accept in part 358 142	Support the deletion of Figure A-1 and include a more appropriate definition of Highly Erodible Land be developed in Schedule A.
363 208 MEL X 511 553 (Support)	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 363 208 Accept in part X 511 553	Support, as above
426 233 Fed Farmers X 511 555 (Oppose)	Delete Schedule A and refer to a definition (supplied) Delete Coastal Erodible Land and define by way of the Glossary.	Reject 426 233 Accept X 511 555	Support, as above
Recommendation Land 38 Glossary terms - Land			
357 11 Horticulture NZ X 511 543 (Support)	Delete the definition of Coastal Highly Erodible Land.	Reject 357 11 Reject X 511 543	Support, subject to the development of a more appropriate definition of Highly Erodible Land in Schedule A
426 222 Fed Farmers X 511 544 (Support)	Delete Definition	Reject 426 222 Reject X 511 544	Support, as above
358 137 TPL	Delete the definition of 'Gully' from the Proposed Plan and any references	No Section 42A report	Support, but that the decision on this

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	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.	recommendation	term be deferred until the Biodiversity Hearing Topic.
363 198 MEL X 511 546 (Support)	Meridian requests the definition of 'Gully' is deleted in its entirety. Any consequential amendments necessary to give effect to this submission.	No Section 42A report recommendations	Support, as above.
358 138 TPL	Delete the definition of '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 in this submission.	Reject 358 138	Support in part the amendment of the definitions of 'Highly Erodible Land (HEL)', 'Hillcountry Highly Erodible Land' and 'Coastal Highly Erodible Land' as per the definitions in Appendix A of the s42A report; and
363 199 MEL X 511 547 (Support)	Meridian requests the definition of Highly Erodible Land is deleted in its entirety; or 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. Any consequential amendments necessary to give effect to this submission.	Reject 363 199 Reject X 511 547	Support in part, as above
373 41 MAF X 511 549 (Oppose)	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 373 41 No Section 42A report recommendation	-
426 21 Fed Farmers X 511 548 (Oppose)	Reword the definition of Highly Erodible Land (HEL) as follows: <i>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 words to that effect).</i>	Reject 426 21 Accept X 511 548	Support in part, as above
358 139 TPL	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 in this submission.	358 139 Reject	Support in part, as above

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363 200 MEL X 511 550 (Support)	Meridian requests the definition of Highcountry Highly Erodible Land is deleted in its entirety; or 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. Any consequential amendments necessary to give effect to this submission.	Accept in part 363 200 Accept in part X 511 550	Support in part, as above
357 3 Horticulture NZ X 511 532 (Support)	Include relevant definitions from the RMA in the One Plan so that users have ready access to all necessary terms.	Reject 357 3 Reject X 511 532	Support, subject to general statement about application of RMA definitions
426 215 Fed Farmers X 511 537 (Support)	Include relevant definitions from the RMA in the One Plan so that users have ready access to all necessary terms.	Reject 426 215 Reject X 511 537	Support, subject to general statement about application of RMA definitions