

Healthy Rivers: proposed rules

Feedback from implementers

18/2/2016



We will cover...

- Property plans
 - Likely numbers
 - Cost
 - Key requirements for rules
- General feedback on rules



Property Plans

Land activity	Landuse	Property Numbers	Totals	Area (ha)	Totals
Farms	Dairy	3638	7606	393,335	715,012
	Sheep and Beef	3287	(45%)	292,663	(74%)
	Deer	144		13,116	
	Hort/croppi	537		15,899	
	ng				
Not farms	Native	127	9258	85,965	246,561
	Forest		(55%)		(26%)
	Plantation	178		94,316	
	Forest				
	Lifestyle	7487		21,519	
	Unclassified	1466		44,761	
Totals		16864	16864	961,573	961,573



Examples of other plan costs

Plan example	Hours	Cost	
SLUI (Horizons)	16 - 20	\$4-5k	
One Plan (Horizons) (N only)	16 - 20	\$4-5k	
Waipa farm plans	40	\$5k	
Sustainable Milk Plans		\$2k	
Lake Taupo Benchmarking and NMPs		\$11k average actual cost	
N benchmarking using SMP or Milk		Potentially quite low	
Co data			
LEP 3	24	\$3k	



Feedback on Decision Tree of Rules

Generic:

- Consents v permitted activities
- Drafting challenges
- Interrelationships between rules/plans
- Monitoring challenges



Rule 1 (prohibited activity)

- Support prohibited activity
- Date of implementation
- Stock in water vs stock exclusion
- Drains?



Rule 2 (non-complying activity)

- Extremely difficult to monitor
- Response to complaints only?
- Enforcement very difficult
- Unintended outcomes?



Rule 3 (permitted activity)

- Implementation challenges again likely to rely on complaint response
- Incorporate requirement to register with Council?
- Incorporate requirement to provide information to Council?



Rule 4 (permitted activity)

- Unintended/perverse outcomes?
 - Small operations might not comply (and need consent)
 - Large operations might comply (and avoid consent)
- What numbers of properties will comply with rules 3 and 4?
- → If large, might this compromise achievement of the water quality objectives



Rules that require property plans

- Scope/nature of rules currently unclear
- Numbers of properties subject to these requirements is currently unclear
- Current industry schemes are very variable
- Industry schemes liability question to be addressed



Property plans (cont)

Whether:

- attached to PA or consent
- Industry-led or not
- the Plan change needs to provide for:
- Clear standards for MP content and process;
- Clear connection between actions and objectives;
- Clear standard for accrediting and auditing plan preparers
- Appropriate council access to relevant information



Questions?

