

FURTHER SUBMISSION FORM

IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSION/S ON NOTIFIED:

PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPĀ RIVER CATCHMENTS AND VARIATION 1 TO PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPĀ RIVER CATCHMENTS



Save this PDF to your computer before answering. If you edit the original form from this webpage, your changes will not save. Please check or update your software to allow for editing. We recommend Acrobat Reader.

Council needs to receive your further submission by 5pm, Monday, 17 September 2018. Please read the notes on making a Further Submission at the end of this form before completing your submission.

IMPORTANT NOTE

A copy of your further submission must be served on the original submitter/s within 5 working days of being lodged with council. An address list of all submitters is included with the summary of decisions requested documents and is available at waikatoregion.govt.nz/healthyivers

YOUR NAME, ADDRESS FOR SERVICE AND CONTACT DETAILS (MANDATORY INFORMATION)

| | | |
|--|--|-----------------------------------|
| Name of submitter (individual/organisation) | Ballance Agri-nutrients Limited | |
| Contact person (if applicable) | Mr. Bruce Taplin | |
| Agent (if applicable) | Enspire Consulting - Bridgette Munro | |
| Email address for service | Bruce.Taplin@ballance.co.nz and bridgette@enspire.co.nz | |
| Postal address for service | Ballance Agri-nutrients Limited | |
| | Hewletts Road, Mount Maunganui, Private Bag 12 503, Tauranga Mail Centre | |
| | Tauranga | Post code: 3143 |
| Phone number/s | Home: | Business: 07 572 8568 extn - 8568 |
| | Mobile: 027 319 5078 | Fax: |

IN ACCORDANCE WITH SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT:

I am:

- A person representing a relevant aspect of the public interest.
In this case, also specify the grounds for saying that you come within this category; or
- A person who has an interest in the proposal that is greater than the interest the general public has.
In this case, also explain the grounds for saying that you come within this category; or
- The local authority for the relevant area.

My reasons are (i.e. grounds for selection above):

Ballance Agri-Nutrients Limited lodged primary submissions to proposed Plan Change 1 to the Waikato Regional Plan on the 7th of March 2017. Ballance Agri-Nutrients is a farmer-owned co-operative with over 19,000 shareholders and approximately 800 staff throughout New Zealand. Amongst other things, the Company owns and operates ten Service Centres which supply fertiliser to a majority of the farms in the Waikato region, as such, the provisions of proposed Plan Change are of particular relevance to the Company.

PLEASE INDICATE WHETHER YOU WISH TO SPEAK AT A HEARING

- Yes, I wish to speak at the hearing in support of my further submission.
 No, I do not wish to speak at the hearing in support of my further submission.

JOINT SUBMISSION

- If others make a similar submission, please tick this box if you would consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

- Yes, I have attached 14 extra sheets. No, I have not attached extra sheets.

SIGNATURE - NOTE A SIGNATURE IS NOT REQUIRED IF YOU MAKE YOUR SUBMISSION BY ELECTRONIC MEANS

Signed pp Bollen Date 17th of September 2018
Type name if submitting electronically

FURTHER SUBMISSIONS CAN BE SENT BY

-  Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
 Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
 (07) 859 0998
 healthyrivers@waikatoregion.govt.nz *Please note: Submissions received by email must contain full contact details.*

PLEASE CHECK that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

Personal information is used for the administration of the submissions process and will be made public. All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal information.

Form 6 of Schedule 1, Resource Management Act 1991.

NOTES ON MAKING A FURTHER SUBMISSION

1. Serving a copy of your further submission

A copy of your further submission must be served on the original submitter within 5 working days after it is served on (i.e. received by) Waikato Regional Council.

2. Further submission content review

Please note that your further submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

3. Privacy information

The Waikato Regional Council will make all submissions and further submissions including name and contact details publicly available on Council's website. Under the RMA, any further submission supporting or opposing an original submission is required to be served on the original submitter after it is served on council therefore your contact details must be made available.

Personal information will also be used for administration relating to the subject matter of the submissions, including notifying submitters of hearings and decisions. All information will be held by the Waikato Regional Council with submitters having the right to access and correct personal information.

Contact us for more information
Phone: 0800 800 401
Email: healthyrivers@waikatoregion.govt.nz



**FURTHER SUBMISSION TO PROPOSED PLAN CHANGE 1 TO THE WAIKATO
REGIONAL PLAN**

TO: Chief Executive
401 Grey Street
Private Bag 3038
Waikato Mail Centre
HAMILTON 3240

BY E-MAIL: healthyrivers@waikatoregion.govt.nz

FURTHER SUBMISSION ON: **Proposed Plan Change 1 to the Waikato
Regional Plan**

NAME OF FURTHER SUBMITTER: Ballance Agri-Nutrients Limited

ADDRESS FOR SERVICE: Ballance Agri-Nutrients Limited
Hewletts Road, Mt Maunganui
Private Bag 12 503
Tauranga Mail Centre
Tauranga 3143

Attention: Mr Bruce Taplin

E-MAIL: bruce.taplin@ballance.co.nz

1.0 INTRODUCTION

Ballance Agri-Nutrients Ltd (hereafter referred to as '**Ballance**', or '**the Company**') lodged primary submissions to proposed Plan Change 1 to the Waikato Regional Plan on the 7th of March 2017. The Company has an interest in the various provisions and submission points that is greater than that of the general public.

Ballance wishes to be heard in support of its submissions and further submissions. If others make similar further submissions, Ballance would consider presenting a joint case with them at any hearing.

Ballance cannot gain an advantage in trade competition through these submissions.

Ballance's further submissions and the reasons for the same are set out within the following table, entitled 'Further Submissions to proposed Plan Change 1 to the Waikato Regional Plan'.

Signature:

A handwritten signature in black ink, appearing to read 'Bruce Taplin', is centered on the page.

Bruce Taplin, for and on behalf of Ballance Agri-Nutrients Ltd

Date: 17th of September 2018

2.0 FURTHER SUBMISSIONS TO PROPOSED PLAN CHANGE 1 TO THE WAIKATO REGIONAL PLAN

| Submitter ID Number | Submission Name | Relevant Proposed Plan Change 1 Provision / Submission Point | Support / Oppose | Reasons | Relief Sought By Ballance |
|---------------------|--|---|------------------|--|---|
| 73714 | <p>Contact Energy Limited (hereafter referred to as 'Contact')</p> <p>Genelle Slack Environmental Advisor Contact Energy Limited Wairakei Power Station Private Bag 2001 TAUPO 3352</p> <p>Genelle.slack@contactenergy.co.nz</p> | <p>Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges</p> <p>Submission Point PC1-7380</p> <p>The submitter requested the following relief:</p> <p>Amend Policy 11 to the following:</p> <p><i>"Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges</i></p> <p><i>Require any person undertaking a point source discharge of nitrogen, phosphorus, sediment or microbial pathogens to water or onto or into land in the Waikato and Waipa River catchments to adopt the Best Practicable Option to avoid or mitigate the adverse effects of the discharge, at the time a resource consent application is decided. Where it is not practicable to avoid or mitigate <u>all any significant</u> adverse effects, an offset measure may be proposed in an alternative location or locations to the point source discharge, for the purpose of ensuring positive effects on the environment to lessen any</i></p> | Support | <p>Ballance Agri-Nutrients Ltd (hereafter referred to as 'Ballance', or 'the Company') supports the direction provided within Policy 11 for the adoption of the Best Practicable Option with regard to managing point source discharges and the provision within the policy which allows for offsetting the adverse effects of discharges to occur at alternative locations (subject to various restrictions).</p> <p>Contact have requested that the words 'all adverse effects' are amended to 'any significant adverse effects', stating that the removal of all adverse effects in many cases may not be feasible or practical, and that mitigation needs to be relative to the scale of the effect. Ballance supports this approach noting that it is not always appropriate or necessary to avoid an adverse effect that is minor, or less than minor in scale.</p> | <p>Ballance seeks:</p> <p>That Submission Point PC1-7380 be accepted.</p> |

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|---------------------|-----------------|--|------------------|---------|---------------------------|
| | | <p><i>residual adverse effects of the discharge(s) that will or may result from allowing the activity provided that the:</i></p> <ul style="list-style-type: none"> <i>a. Primary discharge does not result in any significant toxic adverse effect at the point source discharge location; and</i> <i>b. Offset measure is for the same contaminant; and</i> <i>c. Offset measure occurs preferably within the same sub-catchment in which the primary discharge occurs and if this is not practicable, then within the same Freshwater Management Unit^ or a Freshwater Management Unit^ located upstream, and</i> <i>d. Offset measure remains in place for the duration of the consent and is secured by consent condition.”</i> <p>Further to the amendment above ensure that all adverse effects of a point source discharge are not required to be avoided, mitigated or offset and amend to allow existing and low discharging activities to continue or to be established for both point and diffuse source discharges.</p> | | | |

| Submitter ID Number | Submission Name | Relevant Proposed Plan Change 1 Provision / Submission Point | Support / Oppose | Reasons | Relief Sought By Ballance |
|---------------------|---|---|------------------|--|---|
| 74122 | <p>The Royal Forest and Bird Protection Society</p> <p>Jen Miller</p> <p>The Royal Forest and Bird Protection Society of New Zealand PO Box 2516 Christchurch</p> <p>j.miller@forestandbird.org.nz</p> | <p>Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit</p> <p>Submission Point PC1-8218</p> <p>The submitter requested the following relief:</p> <p><i>“Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit. The restoration and protection of water quality to achieve healthy rivers by 2050.”</i></p> <p>AND RETAIN the explanation.</p> <p>Reasons for Objective 1</p> <p>Submission Point PC1-8228</p> <p>The submitter requested the following relief:</p> <p>AMEND the reasons for adopting Objective 1 to reflect the changes sought for Objective 1.</p> | Oppose | <p>Ballance is supportive of the 80-year timeframe proposed within proposed Objective 1 to achieve the Vision and Strategy set out in Plan Change 1. The Company considers that this timeframe is both appropriate and achievable in that it takes into account the socio-economic effects of implementing a change in management practices.</p> <p>In this regard, the Company considers that the 80-year timeframe recognises that achieving these targets will be difficult and costly to the community, and that new technologies and practices will be needed that are not currently available or economically feasible. It also recognises that considerable tracts of land will need to change land-use to de-intensify discharges of contaminants.</p> <p>In summary, Ballance considers that an 80-year timeframe is realistic in terms of achieving the water quality targets set out in Table 3.11-1, given the</p> | <p>Ballance seeks:</p> <p>That Submission Points PC1-8218 and PC1-8228 be rejected.</p> |

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|---------------------|---|--|------------------|--|---|
| | | | | complexity of managing diffuse discharges, the scale of the change in water quality sought and the very significant costs to the community and inability to adapt if such changes are driven over a shorter period. | |
| 74122 | <p>The Royal Forest and Bird Protection Society</p> <p>Jen Miller</p> <p>The Royal Forest and Bird Protection Society of New Zealand PO Box 2516 Christchurch</p> <p>j.miller@forestandbird.org.nz</p> | <p>Objective 2: Social, economic and cultural wellbeing is maintained in the long term</p> <p>Submission Point PC1-8220</p> <p>The submitter requested the following relief:</p> <p><i>“The restoration, protection and enhancement of water quality contributes to social, economic and cultural wellbeing. Social, economic and cultural wellbeing is maintained in the long term.”</i></p> | Oppose | <p>While the restoration, protection and enhancement of water quality contributes to social, economic and cultural wellbeing, Ballance considers that the approach to achieving water quality must be balanced as intended by the purpose of the Resource Management Act 1991 (‘the Act’ or ‘the RMA’).</p> <p>Further, Ballance considers that the wording of Objective 2 as notified, provides some assurance that the scale and rate of change will not inflict undue social, economic and cultural costs on the community.</p> | <p>Ballance seeks:</p> <p>That Submission Point PC1-8220 be rejected.</p> |
| 74122 | <p>The Royal Forest and Bird Protection Society</p> <p>Jen Miller</p> | <p>Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit.</p> | Oppose | <p>Ballance considers that the target of achieving 10 percent of the required water quality improvement by 2026 to be realistic. To require the</p> | <p>Ballance seeks:</p> <p>That Submission</p> |

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|---------------------|---|---|------------------|---|--|
| | <p>The Royal Forest and Bird Protection Society of New Zealand PO Box 2516 Christchurch</p> <p>j.miller@forestandbird.org.nz</p> | <p>Submission Point PC1-8221</p> <p>The submitter requested the following relief:</p> <p><i>“Immediate improvements are achieved in water quality in each sub-catchment and Freshwater Management Unit Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit”</i></p> <p>AND AMEND the explanation to read:</p> <p><i>“Actions are put in place and implemented by 2026 immediately to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, are sufficient to achieve ten percent of the required change between current water quality and the 80-year water quality attribute targets in Table 3.11-1. A ten percent change towards the long term water quality improvements is indicated by the short term water quality attribute targets in Table 3.11-1”</i></p> <p>Reasons for Objective 3</p> <p>Submission Point PC1-8230</p> | | <p>achievement of immediate improvements may not be possible and would likely give rise to significant costs and economic hardship to those who must implement immediate measures to bring about the required improvements.</p> | <p>Points PC1-8218, PC1-8320 and PC1-8257 be rejected.</p> |

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|---------------------|-----------------|--|------------------|---------|---------------------------|
| | | <p>The submitter requested the following relief:</p> <p>AMEND the reasons for adopting Objective 3 to reflect the changes sought in Objective 3.</p> <p>AND AMEND to ensure the Council set dates for limits/targets in a rule to trigger a review of consents on a sub-catchment or Freshwater Management Unit basis.</p> <p>Policy 5: Staged Approach</p> <p>Submission Point PC1-8257</p> <p>The submitter requested the following relief:</p> <p><i>“Recognise that achieving the water quality attribute targets set out in Table 11-1 will need to be staged over <u>35 years</u> 80 years, to minimise social disruption and allow for innovation and new practices to develop, while making a start on reducing discharges of nitrogen, phosphorus, sediment and microbial pathogens, and preparing for further reductions that will be required in subsequent regional plans. Requiring</i></p> | | | |

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|---------------------|---|---|------------------|---|--|
| | | <i>reductions immediately, an additional reduction in the medium to long term where these are necessary to achieve the targets.”</i> | | | |
| 73182 | <p>Mercury NZ Limited</p> <p>Miles Rowe PO Box 445 HAMILTON 3240</p> <p>Miles.rowe@mercury.co.nz</p> | <p>Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding</p> <p>Submission Point PC1-9569</p> <p>The submitter requested the following relief:</p> <p><i>“Take a prioritised and integrated approach to sub-catchment water quality management by undertaking sub-catchment planning, and use this planning to support actions including edge of field mitigation measures. Support measures that efficiently and effectively contribute to water quality improvements. This approach includes:</i></p> <p><i>a. Engaging early with tangata whenua and with landowners, stakeholders, communities and potential funding partners in sub-catchments in line with the priority areas listed in Table 3.11-2; and...”</i></p> | Support | Ballance supports in principle a collaborative approach to sub-catchment mitigation planning in order to efficiently and effectively contribute to water quality improvements. In doing so, Ballance considers that representation from all relevant parties are required in order to agree balanced and practical solutions. For this reason, Ballance supports the amendment suggested by Mercury to include ‘stakeholders’ as parties that should be engaged early regarding sub-catchment water quality management. | Ballance seeks: That Submission Point PC1-9569 be accepted. |

| Submitter ID Number | Submission Name | Relevant Proposed Plan Change 1 Provision / Submission Point | Support / Oppose | Reasons | Relief Sought By Ballance |
|---------------------|--|---|------------------|---|---|
| 71759 | <p>Department of Conservation</p> <p>Gemma White Statutory Manager (Hauraki-Waikato-Taranaki) Director-General of Conservation Private Bag 3072 Hamilton 3240</p> <p>gwhite@doc.govt.nz</p> | <p>Non-Complying Activity Rules - 3.11.5.7</p> <p>Submission Point: PC1-11059</p> <p>The submitter requested the following relief:</p> <p>Retain Rule 3.11.5.7 with stronger policy guidance to support its use.</p> <p>ALTERNATIVELY, CONSIDER a prohibited activity rule to replace Rule 3.11.5.7, as a mechanism to avoid adverse effects of land use change on water quality.</p> | Oppose | Ballance considers the use of a prohibited activity provision to be inappropriate as a prohibited activity status does not allow for further land use change to occur. In this respect, Ballance considers that resource consent applications for land use change should be assessed on a case by case basis, a prohibited activity status does not achieve this. | Ballance seeks: That Submission Point PC1-11059 be rejected. |
| 74058 | <p>Ravensdown Limited</p> <p>PO Box 1049 Christchurch</p> <p>C/- Chris Hansen PO Box 51-282 Tawa Wellington 5249</p> <p>chris@rmaexpert.co.nz</p> | <p>Method 3.11.4.2 - Certified Industry Schemes</p> <p>Submission Point: PC1-10125</p> <p>The submitter requested the following relief:</p> <p>AMEND Method 3.11.4.2 as follows: “Certified Certification of Industry Schemes <i>Waikato Regional Council will develop an work collaboratively with industry to ensure an agreed certification process is applied for industry bodies as per the standards outlined in Schedule 2. The Certified Industry Scheme will include</i></p> | Support | Ballance considers that the use of nationally consistent industry certification schemes be adopted as a means of achieving the outcomes of the Plan Change, as proposed by the submitter. It is considered that such an approach results in significant efficiencies and represents recognised good practice. | Ballance seeks: That Submission Point PC1-10125 be accepted. |

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|---------------------|---|---|------------------|---|---|
| | | <p><i>formal agreements between parties. Agreements will include:"</i></p> <p>AND ADOPT the definitions sought in this submission relating to certification programmes.</p> | | | |
| 74058 | <p>Ravensdown Limited</p> <p>PO Box 1049 Christchurch</p> <p>C/- Chris Hansen PO Box 51-282 Tawa Wellington 5249</p> <p>chris@rmaexpert.co.nz</p> | <p>New Rules 3.11.5.6B and 3.11.5.6C</p> <p>Submission point: PC1-10158</p> <p>The submitter requested the following relief:</p> <p>ADD a NEW Discretionary Activity Rule as follows: <u>"3.11.5.6B Discretionary Activity</u> <u>The use of land for farming activities not provided elsewhere.</u> <u>The use of land for farming activities that do not meet the matters of discretion included in Rule 3.11.5.6 is a Discretionary Activity.</u> <u>Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected parties."</u></p> <p>AND ADD a NEW Discretionary Activity Rule as follows: <u>"3.11.5.6C Discretionary Activity</u> <u>Land use change consent applications by</u></p> | Support | Ballance supports the proposed rules providing for a consenting pathway for farming activities that are unable to comply with the permitted, controlled or restricted discretionary activity standards. It is considered that the structure proposed allows for the consideration of activities that are managed under a Certified Industry Scheme and Good Management Practices, which is, in the Company's view, appropriate. | Ballance seeks: That Submission Point PC1-10158 be accepted. |

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|---------------------|---|---|------------------|---|---|
| | | <p><u>members of a Certified Industry Scheme that may result in an increase in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens but which does not result in an overall deterioration of water quality at the sub-catchment level due to mitigations adopted.</u> <u>Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected parties."</u></p> | | | |
| 73305 | <p>Fertiliser Association New Zealand</p> <p>Greg Sneath PO Box 11519 Central Wellington 6142</p> <p>greg@fertiliser.org.nz</p> | <p>New Policy 13A: Non-point source consent duration</p> <p>Submission point: PC1-11176</p> <p>The submitter requested the following relief:</p> <p>AND ADD a NEW Policy to read: <u>"Policy 13A: Non-point sources consent duration.</u> <u>When determining an appropriate duration for any consent granted consider the following matters:</u> <u>a. A consent term exceeding 25 years, where the applicant demonstrates the approaches set out in Policies 1 to 4 will be met; and</u> <u>b. The magnitude and significance of the</u></p> | Support | Ballance supports the adoption of a specific provision to address the duration of consents for non-point source discharges, as it provides consistency with the policy direction provided for point source discharges and ensures consistent guidance for plan users. | Ballance seeks: That Submission Point PC1-11176 be accepted. |

| Submitter ID Number | Submission Name | Relevant Proposed Plan Change 1 Provision / Submission Point | Support / Oppose | Reasons | Relief Sought By Ballance |
|---------------------|---|--|------------------|---|---|
| | | <i>investment made or proposed to be made in contaminant reduction measures and any resultant improvements in the receiving water quality; and The need to provide appropriate certainty of investment where contaminant reduction measures are proposed (including investment in treatment plant upgrades or land based application technology)."</i> | | | |
| 73436 | <p>Waikato Environment Centre</p> <p>Sonia Fursdon PO Box 19104 Hamilton 3244</p> <p>sonia@envirocentre.org.nz</p> | <p>Implementation timeframes</p> <p>Submission point: PC1-6228</p> <p>The submitter requested the following relief:</p> <p>AMEND PPC1 to provide for greater urgency to be given to make the proposed changes achievable.</p> | Oppose | As identified in its submission, Ballance is supportive of the 80-year timeframe currently proposed within Plan Change 1. A reduction in this timeframe, as proposed by the submitter, does not take into account the socio-economic effects of the change and as such does not represent sustainable management. | <p>Ballance seeks:</p> <p>That Submission Point PC1-6228 be rejected.</p> |
| 73436 | <p>Waikato Environment Centre</p> <p>Sonia Fursdon PO Box 19104 Hamilton 3244</p> <p>sonia@envirocentre.org.nz</p> | <p>3.11.5 Rules</p> <p>Submission point: PC1-6242</p> <p>The submitter requested the following relief:</p> <p>ADD a NEW Rule to prevent over-fertilizing AND ADD a NEW Rule to prevent over-</p> | Oppose | The submitter has not provided any information to clarify what the identified terms mean, and as a result the submission does not represent sound resource management practice. Ballance considers that, subject to the amendments sought in its submission, the Plan Change | <p>Ballance seeks:</p> <p>That Submission Point PC1-6242 be rejected.</p> |

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|---------------------|--|--|------------------|--|--|
| | | <p>stocking AND ADD a NEW Rule to prevent over-grazing AND ADD a NEW Rule to prevent over-watering AND ADD a NEW Rule to prevent over-draining.</p> | | <p>contains appropriate controls to manage the application of fertiliser and management of farming activities.</p> | |
| 73436 | <p>Waikato Environment Centre Sonia Fursdon PO Box 19104 Hamilton 3244 sonia@envirocentre.org.nz</p> | <p>Schedule 1 - Requirements for Farm Environment Plans Submission point: PC1-6238 The submitter requested the following relief: AMEND Schedule 1 to provide for Farm Environment Plans to be a controlled activity. AND AMEND Schedule 1 to reduce the timeframes for a Farm Environment Plan to be put in place. AND AMEND to provide for monitoring of compliance to be undertaken by a truly independent party.</p> | Oppose | <p>Ballance considers that the changes proposed by the submitter will result in considerable additional cost and administration for plan users and the Waikato Regional Council. Further, there is no information within the submission to identify how the additional requirements sought will result in the achievement of the environmental outcomes sought by the Plan Change.</p> | <p>Ballance seeks: That Submission Point PC1-6238 be rejected.</p> |