

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)	Wairarapa Moana Incorporation	
Contact person (if applicable)	Kingi Smiler Executive Director	
Agent (if applicable)	Jude Addenbrooke, Addenbrooke Advisory Limited environment@addenbrooke.nz	
Email address for service	environment@addenbrooke.nz	
Postal address for service	Wairarapa Moana Incorporation PO Box 1347 Taupo	
Phone number/s	Home: 0274881987	Post code: 3377
	Mobile:	Business: 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):

Wairarapa Moana Incorporation (WMI) is a Maori incorporation with over 3,000 owners. It has an agribusiness focus, with over 11,770 hectares of land in the Mangakino area of the Upper Waikato. It is important to note that being owners of Maori Freehold Land means that the land that WMI owns can never be sold and is to be held for future generations and our owners and Board take their responsibility seriously as kaitiaki (stewards) as the land will pass from generation to generation.

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 3 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 Kingi Smiler Date 17/09/2018
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 SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1	
NAME OF ORIGINAL SUBMITTER: Miraka Limited	ORIGINAL SUBMITTER ID: 73492
ADDRESS OF ORIGINAL SUBMITTER: 108 Tuwharetoa Street, PO Box 740, Taupo 3352	
<i>Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.</i>	
PROVISION: Schedule 1	SUBMISSION POINT ID: PC1-8898
Do you support or oppose the submission? Support	
THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:	I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):
<p>Wairarapa Moana Incorporated (WMI) supports the retention of the Farm Environment Plan approach and schedule, as FEPs will facilitate tailored management of risks and on-farm engagement, a key to practice change. Practice change is the driver for water quality improvement.</p> <p>WMI supports the deletion of Schedule 1(5)(b), for the same reasons as those given by the submitter.</p> <p>The 75th percentile nitrogen leaching value approach is opposed on two main grounds: 1. socio-economic inequity and social disruption; and 2. lack of effectiveness in reducing contaminant discharge and improving water quality in the short term. The 75th percentile approach contradicts Objective 4 and Policy 5, which call for a staged approach to change enabling people and communities to undertake adaptive management to continue to provide for their social, economic and cultural wellbeing in the short term. Given that the 75th percentile is calculated on an FMU basis, variation in biophysical factors that affect leaching rates may result in high NRPs even for those properties or enterprises that have high levels of voluntary mitigation efforts and expenditure. Under the 75th percentile approach farmers who have already done all they reasonably can in terms of mitigations could potentially be forced to de-stock or be forced off their land, causing immense social disruption and economic hardship in local communities.</p>	<p>Part: Retain overall Schedule 1 Allow</p> <p>NOTE: this was a decision sought in the original submission but not included in the Council’s Summary of Submissions. It is important that the original decision sought be retained.</p> <p>Part: DELETE Schedule 1(5)(b) Allow</p> <p>Part: AND ADD a new method where the Nitrogen Reference Point is considered relative to productivity. Allow</p>

We agree with Miraka that Stage 1 improvements in water quality are better met through:

- application of Good Management Practice by all properties and enterprises throughout the region
- determination of contaminant issues at a sub-catchment scale, and associated best practices and mitigation options for those specific issues and in that sub catchment
- requirement for Farm Environment Plans to include tailored risk based Best Management Practices and for these to be implemented, with regulation and enforcement as required.

These methods will generate community and on-farm engagement, which are the foundation of practice change. Practice change is the driver of water quality improvement.

Equity and effectiveness in improving water quality are both enabled with a Practice Change approach, and it supports the principle of “those activities that are furthest from the application of good management practices are expected to make the greatest practice change and greater reductions”.

WMI’s proposition is that reductions in nitrogen losses resulting from Practice Changes across a wider range of agricultural enterprises will lead to much greater reductions in nitrogen discharge than from simply focusing on those enterprises that exceed the 75th percentile as proposed in PC1.

WMI supports Miraka’s suggestion that a method whereby the NRP is related to productivity (or efficiency) could achieve water quality improvement goals without significant social disruption. The Farm Nitrogen Surplus approach is such a method (Beukes et al, 2014).

N Surplus is calculated and reported by Overseer, and removes the conjecture around the fate of N surplus (i.e. nitrate leaching versus emissions of nitrous oxide to the atmosphere) as well as the main issues with Overseer inaccuracy. The N Surplus approach avoids the geophysical bias effects and is therefore a more accurate reflection of management practices, which can be changed in the short term. It enables identification

<p>of those properties or enterprises that are most distant from Best Management Practice to become the focus of N loss reductions, and thereby facilitates the greatest improvements in water quality with the least social and economic disruption in the short term.</p>	
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FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1

<p>NAME OF ORIGINAL SUBMITTER: Miraka Limited</p>	<p>ORIGINAL SUBMITTER ID: 73492</p>
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<p>ADDRESS OF ORIGINAL SUBMITTER: 108 Tuwharetoa Street, PO Box 740, Taupo 3352</p>	
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Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.

<p>PROVISION: All</p>	<p>SUBMISSION POINT ID: PC1-8742, 8759, 8765, 8766, 8767, 8906, 8775, 8807, 8809, 8907, 8810, 12840, 8811, 8816, 8819, 8820, 8821, 8822, 8823, 8824, 8829, 8838, 8843, 8848, 8850, 8853, 8855, 8862, 8870, 8882, 8885, 8887, 8888, 8889, 8890, 8891, 8892, 8893, 8894, 8895, 8896, 8897, 12465, 8898, 8899, 8900, 8901, 8902, 8903, 8904, 8905</p>
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<p>Do you support or oppose the submission? Support</p>	
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<p>THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:</p>	<p>I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):</p>
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<p>Same reasons as those given by the submitter.</p>	<p>Whole Allow</p>
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