

SUBMISSION FORM

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

IMPORTANT NOTE

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.

We need to receive your submission by 5pm, 23 May, 2018

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

Name of Submitter (individual/organisation)		
Contact Person (if applicable)		
Agent (if applicable)		
Email address for service		
Postal address		
Phone number/s	Home:	Business:
	Mobile:	Fax:

PLEASE INDICATE WHETHER YOU WISH TO SPEAK AT A HEARING

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

TRADE COMPETITION AND ADVERSE EFFECTS (SELECT APPROPRIATE)

- I could / could not gain an advantage in trade competition through this submission. *Refer to last page for further information*
- I am / am not directly affected by an effect of the subject matter of the submission that:
- adversely effects the environment, and
 - does not relate to the trade competition or the effects of trade competition.

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

- Yes, I have attached _____ 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 _____ Date _____
Type name if submitting electronically

SUBMISSIONS CAN BE



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 administration 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 5 Clause 6 of First Schedule, Resource Management Act 1991

1. Trade competition

If you could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of part 1 of Schedule 1 of the Resource Management Act 1991 (RMA).

6 Making of submissions

- (4) A person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that –
- a) adversely affects the environment; and
 - b) does not relate to trade competition or the effects of trade competition.

2. Privacy information

The Waikato Regional Council will make all submissions and further submissions including name and contact details publicly available at public libraries in the region, Council Offices and on Council's website. Any further submission, under the RMA, supporting or opposing your submission is required to be forwarded to you as well as Council.

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.

3. Submission Content Review

Please note that the RMA states that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one 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.

If you have questions about making a submission, please visit waikatoregion.govt.nz/healthyrivers to see our factsheet about Making a Submission.

SUBMISSIONS ON SPECIFIC PROVISIONS OF VARIATION 1 TO PROPOSED PLAN CHANGE 1 – Ata Rangi 2015 Partnership (“Ata Rangi”)

PROVISION: Amendments that seek to alter some reporting and or compliance dates applying to rules/methods	
<input type="checkbox"/> Support <input type="checkbox"/> Support with amendment <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Oppose with amendments	
DECISION SOUGHT	SUBMISSION
The decision I would like the council to make regarding this provision is:	The reason for requesting the decision is:
<p>Replace dates with suitable alternative dates which are practical and capable of being achieved by landowners/farmers and able to be implemented by Waikato Regional Council. These dates should be subject to review and confirmation during the hearings.</p> <p>Amend date range for assessment of NRP to include the years 2016/2017, in addition to 2014/2015 and 2015/2016.</p> <p>Any other further and/or consequential relief which addresses the reasons for submission.</p>	<p>The dates for compliance with various rule requirements have been amended by variation 1 to PPC1 (information to be provided to WRC in rule 3.11.5.2; timing for provision of Farm Environment Plan (“FEP”) in rule 3.11.5.3; timing for when controlled activity rule 3.11.5.4 applies to farming activities with a FEP not under certified industry scheme; timing for provision of FEP under rule 3.11.5.4; timing for when existing commercial vegetable production activities become classed as controlled in rule 3.11.5.5 and amendments to dates in the advisory note to the same rule; timing for registration under Schedule A; timing for provision of Nitrogen Reference Point (“NRP”) and NRP data in Schedule B).</p> <p>There is no explanation or analysis which explains the reasons for the changes. It is understood that the changes were made in light of the timing of the plan change process. However, which the changes are presented as consequential changes, they are not. The dates are critical to the implementation of the plan change and assessing its effectiveness.</p> <p>The section 32 evaluation does not address the proposed date changes.</p> <p>Notwithstanding the above, it is appropriate for these dates to be amended so that they are practical and capable of being achieved by landowners/farmers and able to be implemented by Waikato Regional Council. This applies to the 2026 dates as well as others.</p> <p>For the avoidance of doubt in relation to its original submission on PPC1, Ata Rangi also opposes the date range for the assessment of NRP for other farming activities (i.e., excluding commercial vegetable production). This should be extended to include 2016/2017 to better reflect current state.</p>

SUBMISSIONS ON SPECIFIC PROVISIONS OF VARIATION 1 TO PROPOSED PLAN CHANGE 1 – Ata Rangī 2015 Partnership (“Ata Rangī”)

PROVISION: SCHEDULE B - NRP	
<input type="checkbox"/> Support <input type="checkbox"/> Support with amendment <input type="checkbox"/> Oppose <input checked="" type="checkbox"/> Oppose with amendments	
DECISION SOUGHT	
SUBMISSION	
The decision I would like the council to make regarding this provision is:	The reason for requesting the decision is:
<p>That Schedule B NRP is amended to provide for variation of the Overseer model standards to allow measured soil carbon and nitrogen levels to be included in the analysis so that actual farm soil conditions are reflected in the outcome. Such variation of the values for nitrogen immobilisation potential may only occur if the variation is validated by a suitably qualified professional.</p>	<p>The N profile for land which was formerly in plantation forest and converted to pasture for farming may be significantly different to land which has historically been pasture land. This is due to the N being absorbed by the high carbon content in the system (which, as it breaks down, holds a high amount of N”. As a consequence, the ratio between carbon and nitrogen is increased and less is available to plants – i.e., pasture. The current “best practice” input standard (as set out in Schedule B of PPC1) do not allow inputs to be varied to reflect this unique circumstance. To establish an accurate NRP through Overseer for land which can be treated as “developing” or “developed”, Schedule B should be amended to allow the values for N mobilisation potential to be varied to reflect the actual farm soil conditions. However, any such variation would be subject to verification by a suitably qualified person.</p> <p>This proposal may be appropriate for other properties, not just “developing” or “developed” land. As such, the relief sought is not confined to such properties.</p>

SUBMISSIONS ON SPECIFIC PROVISIONS OF VARIATION 1 TO PROPOSED PLAN CHANGE 1 – Ata Rangi 2015 Partnership (“Ata Rangi”)

PROVISION: FURTHER AND CONSEQUENTIAL RELIEF SOUGHT	
<input type="checkbox"/> Support <input type="checkbox"/> Support with amendment <input type="checkbox"/> Oppose <input type="checkbox"/> Oppose with amendments	
DECISION SOUGHT	SUBMISSION
The decision I would like the council to make regarding this provision is:	The reason for requesting the decision is:
<p>In addition to the particular relief sought in the submission above, Ata Rangi reserves its position in relation to all aspects of PPC1 as varied, and seeks any other further and/or consequential relief which addresses the reasons for its submission.</p>	