

Proposed Waikato Regional Plan Change 1 - Waikato and Waipa River Catchments.

SubForm	PC12016	COVER SHEET	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

Submission form on publicly notified -
Proposed Waikato Regional Plan Change 1 -
Waikato and Waipa River Catchments.

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

SUBMISSIONS CAN BE

Mailed to	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
Delivered to	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
Faxed to	(07) 859 0998 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
Emailed to	healthyrivers@waikatoregion.govt.nz <i>Please Note: Submissions received by email must contain full contact details. We also request you send us a signed original by post or courier.</i>
Online at	www.waikatoregion.govt.nz/healthyrivers
We need to receive your submission by 5pm, 8 March 2017.	

YOUR NAME AND CONTACT DETAILS

Full name	John ALLEN		
Full address	192 Cameron Town Road, RD3, Pukekohe 2678		
Email	john@wjohnallen.nz	Phone	021 46 36 86
		Fax	

ADDRESS FOR SERVICE OF SUBMITTER

Full name	John ALLEN		
Address for service of person making submission	192 Cameron Town Road, RD3, Pukekohe 2678		
Email	john@wjohnallen.nz	Phone	021 46 36 86
		Fax	

TRADE COMPETITION AND ADVERSE EFFECTS *(select appropriate)*

~~I could~~ / could not gain an advantage in trade competition through this submission.

I am / ~~am not~~ directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment, and

~~(b) does not relate to the trade competition or the effects of trade competition.~~

Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO

*Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1
(continue on separate sheet(s) if necessary.)*

Schedule 1 - Requirements for Farm Environment Plans (FEPs)

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

(select as appropriate and continue on separate sheet(s) if necessary.)

Support the above provision with amendments

MY SUBMISSION IS THAT

*Tell us the reasons why you support or oppose or wish to have the specific provisions amended.
(Please continue on separate sheet(s) if necessary.)*

Schedule 1 describes the requirements for FEPs in relation to the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens. It discusses fencing and minimum grazing setbacks. It mentions riparian management as a principle but does not go in to specifics.

There are a number of proven and effective discharge mitigation technologies available but they are not mentioned in the Schedule. Two are biochar filter beds and Miscanthus planting. There will be more as innovative farmers find ways to reduce their discharges to water ways.

Plan Change 1 needs to explicitly provide for these new discharge mitigation technologies so that farmers are not disadvantaged when a technology, not allowed for in the Plan, becomes available.

I SEEK THE FOLLOWING DECISION BY COUNCIL

(select as appropriate and continue on separate sheet(s) if necessary.)

~~-Accept the above provision~~

Amend as follows:

To Clause 4 of Schedule 1, add:

“For discharge mitigation actions that are not or cannot be modelled within Overseer, include references to published scientific papers that support your mitigation claims.”

PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

~~-I wish to speak at the hearing in support of my submissions-~~

JOINT SUBMISSIONS

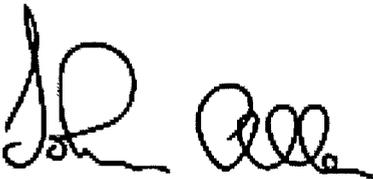
If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

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

<input checked="" type="checkbox"/> Yes, I have attached extra sheets.	No, I have not attached extra sheets.
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SIGNATURE OF SUBMITTER

(or person authorised to sign on behalf of submitter)
A signature is not required if you make your submission by electronic means.

	Date 8 March 2017
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Personal information is used for the administration of the submission 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.

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.

Additional sheet to assist in making a submission

Section number of the Plan Change	Support /Oppose	Submission	Decision sought
Please refer to title and page numbers used in the plan change document	Indicate whether you support or oppose the provision.	State in summary the nature of your submission and the reasons for it.	State clearly the decision and/or suggested changes you want Council to make on the provision.
Objective 5 Paragraph a. i. Objectives 3.11.2	Oppose	<p>this object accords tangata whenua a right not available to other communities and land owners.</p> <p>The ability to manage their own lands (whether ancestral or not) and resources, by exercising mana whakahaere (authority, jurisdiction,...), for the benefit of their people ought be a universal right accorded everyone without regard to ethnicity.</p>	Delete Objective 5
Policy 2 and Policy 3 Policies 3.11.3	Support but with amendment	The tailored approach for commercial vegetable growers (Policy 3) differs from that of pastoral farmers (Policy 2) in a way that disadvantages vegetable growers who grow on a small scale.	<p>Define what constitutes a 'commercial' vegetable grower as distinct from a small scale grower who sells excess produce to a retail outlet or at their farm gate.</p> <p>A definition based on the area under cultivation is appropriate and parallels the Small and low intensity farmer (Rule 1).</p> <p>Definition: Commercial vegetable production \geq 1,000 sq metres of land in production at any one time.</p>
Schedule B - Nitrogen Reference Point	Support but with clarification	A Nitrogen Reference Point is a key consent parameter. Its determination within Overseer includes many exceptions & inclusions and omits some edge of field technologies not handled by Overseer.	Ensure that blind bureaucratic insistence does not unnecessarily disadvantage farms that are outside of the norms and averages built in to Overseer. In particular, where edge of field technologies not covered by Overseer are implemented, (eg biochar filter beds, Miscanthus plantings,...) the farmer's efforts are recognised.

Section number of the Plan Change	Support /Oppose	Submission	Decision sought
Policy 4 Policies 3.11.3	Support but with amendment	Policy 4 enables activities with lower discharges to continue, or to be established. Which is fine. But it does not allow for the easy adoption of new mitigation techniques that are not yet in mainstream practices.	Change wording to ""Enabling activities with lower discharges to continue or to be established, including or mitigation practices that will reduce the cumulative
Policy 6 Policies 3.11.3	Oppose	The exception related to Policy 16 is objected to on the basis that it unjustly favours one group in society over all others.	Delete the part sentence "Except as provided for in Policy 16"
Policy 16 Policies 3.11.3	Oppose	Policy 16 is objected to on the basis that it unjustly favours one group in society over all others.	Delete in its entirety.
Policy 10 Policies 3.11.3	Support but with amendment	Policy 10 is too open-ended as written, giving territorial local authorities and industries carte blanche to do whatever they want to do if the project is significant.	Amend by adding "subject only to Policy 11 and Policy 12" after bullet point b).
Policy 11 a) Policies 3.11.3	Support but with amendment	Policy 11 requires that a primary discharge "does not result in any significant toxic adverse effect at the point source discharge location". The descriptor "significant" requires defining.	Define the descriptor "significant" in terms of for example, the level of high discharge as a percentage of the upper limit and a duration.
Policy 13 Policies 3.11.3	Support but with amendment	When determining an appropriate duration for any consent granted, the local community affected directly by the discharge, ought be consulted as a matter of course.	Add sub-point d) The views of the local community as obtained from a timely consultation process.