

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

Submission form on publicly notified – 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	

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 my 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 Adrienne Anne Ransley		
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ADDRESS FOR SERVICE OF SUBMITTER		
Full name Adrienne Anne Ransley		
Address for service of person making submission 369/8 Flume Road RD4 Cambridge 3496		
Email Adrienne.ransley@sharenz.com	Phone 027-208-9699	Fax

TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i>
<input type="checkbox"/> I could / <input checked="" type="checkbox"/> could not gain an advantage in trade competition through this submission.
<input checked="" type="checkbox"/> I am / <input type="checkbox"/> am not directly affected by an effect of the subject matter of the submission that: (a) adversely effects 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.)

All listed on separate sheet below

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

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

- Support the above provisions
- Support the above provision with amendments
- Oppose the above provisions

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.)

The objectives are well intentioned but the execution is overly complex and encourages inequalities based on historical land use. Those who have historically applied high rates of fertilizer will have a higher property scale nitrogen reference point than those that apply lower rates of fertilizer and thus rewarding those that have a higher potential to pollute than others. This is blatantly unfair to those who did not apply fertilizer in 2016 due to financial or other reasons.

The property values for those with historical high fertilizer application rates will be higher than those who have in 2016 applied less fertilizer creating inequalities.

Farms should be assessed for contour and scaled from 1-5, with 1 being flat and 5 being very steep, the allowable fertilizer application rates would vary depending upon the contour. The fertilizer application rates would need to be calculated to minimize the environmental impact without financially impacting farmers.

This approach would be equitable for all land owners with the potential profitability of any farm and the value of the land being related to contour not historical fertilizer application.

This approach would negate the need for language around the flexibility offered for Māori land, every land owner would be treated the same, no appartied!

This approach would also negate the need for cumbersome stocking rate calculations and consent applications as the amount of fertilizer applied would be closely related to stock rates. Some farmers would buy in feed but if this comes in from another NZ farm the stocking rate balance between these two farms would cancel each other out. Feed being imported should be controlled.

Fencing of waterways does need to occur but not to the point of making a farm uneconomic I believe that every farm should have to put 5% of it's turnover back into fencing water ways until complete. This fence needs to be adequate to prevent access to waterways.

The current proposal also penalizes the land users that were not intensively farming on the 22nd of October 2016, again creating inequities based on historical land use.

I SEEK THE FOLLOWING DECISION BY COUNCIL

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

- Accept the above provision
- Accept the above provision with amendments as outlined below
- Decline the above provision
- If not declined, then amend the above provision as outlined below

Amend as follows:

Remove reference to fertiliser rates and stocking rates based on Oct 2016.

Standardise allowable fertiliser rates based on land contour, fertiliser rates will ultimately determine stocking rates.

Further detail in the extra sheet

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.

I do not 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

Yes, I have attached extra sheets.

No, I have not attached extra sheets.

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.

Signature



Date: 8 March 2017

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.
3.11.3 Policy 1	Oppose	Requiring land from 0-10 Degrees to apply a maximum of (TBD) t/ha Requiring land from 10-30 Degrees to apply a maximum of (TBD) t/ha Requiring land greater than 30 Degrees to apply a maximum of (TBD) t/ha	Simplify this clause
3.11.3 Policy 1 (c) & (d)	Oppose	This clause bases discharge rates on historical values rather than best practice, i.e. rewarding potential polluters and limiting progress by farmers that currently have applied low rates of fertiliser.	Remove these clauses
3.11.3 Policy 7 (b)	Oppose	This creates inequity based on race, if the fertiliser application rates are based on contour not historical applicate rates this becomes superfluous	Remove this clause
3.11.3 Policy 9. (c)	Oppose	The proposal in its' current state cannot be considered cost-effective	Alter proposal to match this policy statement.
3.11.3 Policy 16	Oppose	This creates inequality based on race, if the fertiliser application rates are based on contour not historical applicate rates this becomes superfluous	Remove this clause
3.11.5.2 (3) (b) (i)	Oppose	Stocking rate is dependent upon fertiliser application which should be controlled. In its' current state the proposal means if you have breeding cows and one is late to calve you need to apply for consent for the additional calf if it puts you over 6 Su/Ha This is cumbersome and has no direct effect on the	Remove this clause
Doc # 9150077		environment	

3.11.5.2 (3) (c)	Oppose	Cost inhibitive activity contrary to policy 9.	Remove this clause
3.11.5.2 (3) (c)	Support/Oppose	Waterways to be fenced using 5% of farm turnover until completed	Modify this clause as to not overly burden land owners
3.11.5.2 (4) (c)	Oppose	Every dry stock block will have a lot of land greater than 15 Degrees, this land can be managed by fertiliser application rates which will limit stocking rates.	Remove this clause
3.11.5.2 (5) (c)	Oppose	Should only apply to imported feed, if I buy off my neighbour I can stock a little higher he can stock a little lower by the same amount hence it is balanced. The only time the balance within NZ is lost is when feed is imported.	Modify this clause
Schedule A		WRC already has a lot of this information unnecessary administrative burden to resupply. WRC should present a document for review and amendment	Modify this clause
Schedule B	Oppose	Too heavily based on modelling	Control fertiliser application and review in 3 years
Schedule C	Oppose	Waterways to be fenced using 5% of farm turnover until completed	Modify this clause as to not overly burden land owners. Most will achieve the requirement quickly but larger operations need more time to ensure they remain in business.