

PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 WAIKATO AND WAIPĀ RIVER CATCHMENTS



Submission form on publicly notified – Proposed
Waikato Regional Plan Change 1 – Waikato and
Waipā River Catchments.

**Important: 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.**

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

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

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 Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses
Emailed to	healthydrivers@waikatoregion.govt.nz Please Note: Submissions received by email must contain full contact details.
Online at	www.waikatoregion.govt.nz/healthydrivers

We need to receive your submission by 5pm, 8 March 2017.

YOUR NAME AND CONTACT DETAILS

Full name: Perrin Ag Consultants Ltd
 Full address: PO Box 596, Rotorua 3040
 Email: lee@perrinag.net.nz
 Phone: 021 457 511 Fax: _____

ADDRESS FOR SERVICE OF SUBMITTER

Full name: Lee Matheson, Managing Director, Perrin Ag Consultants Ltd
 Address for service of person making submission: PO Box 596, Rotorua, 3040
 Email: lee@perrinag.net.nz
 Phone: 029 3955 312 Fax: 07 349 1112

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:
- adversely effects the environment, and
 - 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 B - Nitrogen Reference Point

Specifically the provision in section g for 'Missing Data' to be calculated by Waikato Regional Council at '75% of normal Freshwater Management Unit average values for those inputs'

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).

In the situation where farmers, through no fault of their own, have only one year's data for the benchmark period, provision should be made for them to choose the 75% of the average calculations OR the data for the year they have available.

Many farmers will have purchased farms, before Plan Change 1 and the benchmark period were officially notified. These farmers may be able to obtain little or no data from the previous owners, and in the event where data is scarce, the previous owner is unlikely to pay the costs for an affidavit to confirm data which is missing. It would seem reasonable for these farmers to be able to choose the better of the two options, both of which are most likely to result in a lower allocation of nitrogen to the property than would have occurred in either of the benchmark years.

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
- Decline the above provision
- If not declined, then amend the above provision as outlined

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

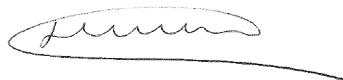
- If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

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

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: 3.11.5.4 Controlled Activity Rule

Do you support or oppose the provision?

Support Oppose

Submission	Decision Sought
<p><i>State in summary the nature of your submission and the reasons for it.</i></p> <p>Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026.</p>	<p><i>State clearly the decision and/or suggested changes you want Council to make on the provision.</i></p> <p>With indications that 75th percentile nitrogen loss is to be calculated on a Freshwater Management basis, farmers in the Upper Waikato, farming on pumice soils will be unfairly disadvantaged, when compared to farmers with similar systems allophanic or other soils within the same FMU. This rule will potentially not focus on those farmers with unsound environmental systems, but bring about restrictions based on soil type. Any reductions down to the 75th percentile should take into account soil type and management systems, not solely overall N loss.</p>

Section number of the Plan Change: Schedule B - Nitrogen Reference Point

Do you support or oppose the provision?

Support Oppose

Submission	Decision Sought
<p><i>State in summary the nature of your submission and the reasons for it.</i></p> <p>Lack of ability for trading and transfer of nitrogen</p>	<p><i>State clearly the decision and/or suggested changes you want Council to make on the provision.</i></p> <p>As part of any robust nutrient cap, the ability of farmers to transfer or trade in nitrogen is imperative to maximise economic use of the limited resource. As a minimum, farmers should be able to transfer nitrogen to allocate this limited resource in the most efficient way. Without ability to trade nitrogen, farmers with multiple properties will not have the opportunity to retire poorer land and better farm stronger areas. In addition, there could be a dis-incentive for farmers to purchase, or sell poorer blocks and retire them from stock, using the nitrogen to more efficiently farm better land. In addition, WRC have indicated that nitrogen losses are tied to the individual title and even OVERSEER block, with no ability to transfer this nitrogen, opportunities for mitigations such as subdivision, may also become untenable.</p> <p>Long term, the opportunity for farmers to sell nitrogen is also imperative to the success of the 80 year plan for the catchment.</p>

ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION

Section number of the Plan Change: 3.11.5.7 Non-complying activity rule - Land Use Change

Do you support or oppose the provision?

Support

Oppose

Submission

State in summary the nature of your submission and the reasons for it.

The treatment of land use change as a non-complying activity until 1 July 2026

Decision Sought

State clearly the decision and/or suggested changes you want Council to make on the provision.

Once Nitrogen reference points ("NRPs") have been established, then restriction on land-use change is irrelevant. It shouldn't matter what land use activity is occurring within a farm business so long as that activity is compliant with its NRP. On that basis, we suggest that land use change become a controlled activity under Rules 3.11.5.3 through 3.11.5.5 from 1 July 2019 (or the point at which NRPs have been established).

Section number of the Plan Change:

Do you support or oppose the provision?

Support

Oppose

Submission

State in summary the nature of your submission and the reasons for it.

Decision Sought

State clearly the decision and/or suggested changes you want Council to make on the provision.