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 OF	FICE 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	healthyrivers@waikatoregion.govt.nz Please Note: Submissions received by email must contain full contact details.							
Online at	www.waikatoregion.govt.nz/healthyrivers							
	We need to receive your submission by 5pm, 8 March 2017.							
YOUR NAME A	ND CONTACT DETAILS							
Full name: Dr H	lugh Jelllie							
Full address:	Larcy Rd, Lynmore, Rotorua							
Email:hugh@	dairyconcepts.co.nz							

TRADE COMPETITION AND ADVERSE EFFECTS (select appropriate)

- O I could / O could not gain an advantage in trade competition through this submission.
- O I am / o 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).

Schedule 1 - page 51; General dependence on the use of Overseer in predicting future environmental impact. The lack of science and monitoring at the sub-catchment level

The unnecessary cost and overly restrictive nature of the rules and policies

Schedule B - Nitrogen Reference Point page 47; The impact of the N Reference point on farm businesses and economic health of the regions

3.11.5.2 Permitted activity rule is too restrictive

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).

Overseer does not at this stage take into account the impact of; biological activity of the soil, diversity of pasture species and animal rumen status on N content of urine and the impact on nutrient run off. It is a theoretical model only; research is required to validate the predictions made by Overseer before it is relied upon as the basis of this plan change through the Farm Environment Plans and Nitrogen Reference Points.

The Nitrogen Reference Point and the targets set for nitrogen, phosphorus, sediments and microbial pathogens are too restrictive on farming businesses. I agree that there should be a target to reduce these overtime on a region wide basis but oppose the view that those currently with low levels are unable to allow these levels to increase provided they still remain below a target. There needs to be practical flexibility here with an overall trend below a to be set target line. Those who have already made good progress should not be unfairly penalised.

There should be provision for exisiting farming operations with low levels of discharge to expand their operations through conversion of or inclusion of new land (for example bringing in a block of forestry on farm or neighboring provided it is one enterprise) provided this activity does not take the overall enterprise including the new block above the targets. I do not agree with a total ban on land use change.

I SEEK THE FOLLOWING DECISION BY COUNCIL

1	(Select	as d	orage	priate	and	continue	on se	parate	sheet(5)	if necessary)	1
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Accept the above provision

• Accept the above provision with amendments as outlined

O Decline the above provision

O If not declined, then amend the above provision as outlined

PLEASE IND SUBMISSIO		G THE RELEVANT	BOX WHETHER YOU WIS	H TO BE HEARD IN SUPPORT	OF YOUR
I wish to	speak at the hearin	g in support of my	y submissions.		
) I do not v	wish to speak at the	hearing in suppor	rt of my submissions.		
OINT SUBA	MISSIONS				
) If others	make a similar subr	nission, please tic	k this box if you will conside	er presenting a joint case with the	em at the hearing.
F YOU HAV NDICATE B		HEETS FOR THIS	SUBMISSION PLEASE ATTA	ACH THEM TO THIS FORM AN	D
Yes, I hav	e attached extra sh	ieets.	○ No, I have no	ot attached extra sheets.	
GNATURE	OF SUBMITTER				
gnature:	Hugh Jellis		Date: 8 March	2017	
	ormation is used for			and will be made public. All info access and correct personal infor	
nii be neid	by Walkato Regiona	i Councii, with suc	militers flaving the right to a	access and correct personal info	mation.

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: 3.11.2 Support Oppose Do you support or oppose the provision? Submission **Decision Sought** 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 1 page 27 The measurement of water quality is too restrictive and To monitor for these chemicals and to include targets to needs to be broadened to include pesticides and keep levels of these chemicals below known toxic herbicides used in agriculture. these are known to be levels in water. building up in out waterways and environment with risk to ecology and people. Objective 2 page 27 Social, ecconomic and cultural well being maintained. There appears to be know mechanism for this in the document. There needs to be a measurement showing improvement in social benefit and economic improvement as part of this plan change. Section number of the Plan Change: 3.11.5.2 Support Oppose Do you support or oppose the provision? **Submission Decision Sought** 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. Permitted Activity Rule - Other farming activities This is too restrictive and discourages low impact 3.b Delete agriculture. Low impact farming of a larger scale should 4.b. ii Increase to 25kgN/ha/yr be a permitted activity provided it meets low impact 4.c Modify to remove absolute requiremetn not to criteria as outlined. graze land steeper that 15 degrees but require each farm to include in it Farm Environment Plan a plan to remove any risk of erosion or damage to this steeper country.

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Submission	Decision Sought	To the second
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