

**WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 -
WAIKATO AND WAIPA RIVER CATCHMENTS**

Submission Form

Submission on a publically notified proposed Regional Plan prepared under the Resource Management Act 1991.

On: The Waikato Regional Councils proposed Waikato Regional Plan Change 1 - Waikato and Waipa River Catchments

To: Waikato Regional Council
401 Grey Street
Hamilton East
Private bag 3038
Waikato Mail Center
HAMILTON 3240

Complete the following

Full Name(s): [REDACTED]

Phone (hm): [REDACTED]

Phone (wk): [REDACTED]

Postal Address: [REDACTED]

Phone (cell):

Postcode:

Email: [REDACTED]

I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

I wish to be heard in support of this submission.

Comment [j1]: If this is a group submission everyone must include their details and sign the form, unless the group is a legal entity.

To help the council the group could give itself a name ie collectively referred to as the group.

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Signature **date**

Signature **date**

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Introduction

Thank you for the opportunity to submit on the Waikato Regional Councils proposed Plan Change 1.

We are sheep and beef farmers in the

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Hauturu.

Comment [j2]: Have you undertaken any environmental work on your property, or have stock management policies to retain soils? If you have something then put it in briefly in your introduction

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The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following table. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan, including Objectives, Policies, or other rules, or restructuring of the Plan, or parts thereof, to give effect to the relief sought.

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
Objective 1 & Table 3.11-1	Support with amendments	I support the long-term restoration and protection of our waters. However, I am concerned that the table 3.11-1 80 year numerical water quality targets may not be achievable, and possibly not even achievable under pristine conditions	<p>Retain the intent of Objective 1, but amend Table 3.11-1 so that the water quality targets are achievable.</p> <p>Water quality targets, should provide for the values of waterbodies such as ecological health, and cultural values. However they should also be set at numerical states which provide for the social and economic wellbeing of people and communities, and take into account any implications for resource users, including implications for actions, investments, and ongoing management changes.</p> <p>Amend Table 3.11-1 so that the numerical targets do not apply during flood events or when the parameter does not influence the value ie Ecoli</p>

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			should apply at times when people swim or primary contact with water is undertaken for cultural reasons.
Objective 2	Support this objective with amendments	<p>I believe maintaining the long-term social, economic, and cultural wellbeing of the Waikato Waipa communities is essential to the survival of our rural and urban communities.</p> <p>I am concerned that the plan does not achieve this, as set out below.</p>	Retain and strengthen the objective in relation to providing for the the long-term social, economic, and cultural wellbeing of the Waikato Waipa communities. Including ensuring the economic resilience, sustainability, and vibrancy, of people and communities.
Objective 4 People and community Resilience	Support with amendments	<p>We support objective 4 in relation to providing for People and community resilience, however as currently proposed the objective fails to provide for this outcome because it recognises that as currently proposed PC 1 will not achieve its objectives and further plan changes including increasing stringency of land use controls will be required (Objective 4b). The outcome is a plan which fails to provide communities and individual's certainty about what will be required of them in the future, and which fails to ensure people and community resilience.</p> <p>The plan fails to provide a pathway for individual and communities to work together to achieve the V&S</p>	<p>Amend the objective so that it provides for People and Community resilience over the life of the plan.</p> <p>Numerical Freshwater objectives should not be set if they are not achievable. The plan should clearly set out how it intends to achieve the 80 year outcomes now to provide certainty for people and communities.</p> <p>Delete clause b.</p>

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<p><i>Permitted Activity Rules</i> <i>Rules 3.11.5.1 and 3.11.5.2</i></p>	<p>Oppose</p>	<p>As proposed rules 3.11.5.1 and 3.11.5.2 fail to provide for low intensity and low risk land uses and fail to provide flexibility for these land uses.</p> <p>I seek that the rules permitting low intensity land uses and other land uses be amended so that they are consistent with policy 4, and actually provide for small, and low intensity, and low risk farming activities to be enabled. This includes ability to continue if existing, be established, and enabled to be flexible.</p>	<p>Amend rules 3.11.5.1, and 3.11.5.2:</p> <ol style="list-style-type: none"> 1. Incorporate into one rule 2. Amend to include as Permitted Activity land uses with stocking rates at or below 18 stock units and enable stocking rate to increase from current up to this standard, or and 3. Relate stocking rate or/and nitrogen discharge to the natural capital of soils for sustainable production/ farming; 4. Delete 6 stock unit standard 5. Delete 4.1 hectares and provide for up to 20 hectares 6. Apply national stock exclusion requirements which relate to exclusion of cattle, deer, and pigs, from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier, or other technologies) on flat land and rolling land, but not hill country 7. Enable flexibility in land use, discharges, and stocking rates up to these standards 8. Delete any standards or clauses which hold land uses to historic discharge levels or stocking rates 9. Delete standard 4c Rule 3.11.5.2 10. Amend riparian setback

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			distances so they only apply to flat and rolling land and not hill country (ie slope ≥ 15 degrees)
<p><i>Restricting land use change.</i></p> <p><i>Policy 6</i> <i>Rule 3.11.5.7 and any relevant points within the plan</i></p>	I oppose this	<p>It affects the value of our land and impedes any future ability to develop and grow our businesses.</p> <p>On a professional level it affects many of our elder clients and their ability to market their land in the future should it be suitable for dairying, and effectively removes huge amounts of equity, due to drop in value of land</p>	Deleted in its entirety. It would be more appropriate to gauge land capability through the Farm Environment Plans (FEP) than to use a blanket prohibition
<p><i>Nitrogen management application of the Nitrogen Reference Point (NRP) & use of OVERSEER</i></p> <p><i>Policy 2 and 7</i> <i>Rules 3.11.5.2 to - 3.11.5.7 (inclusive)</i> <i>Schedule B and all other areas in PC1 which refer to the Nitrogen Reference Point</i></p>	Oppose	<p>I oppose this grandparenting approach (holding users to their Nitrogen Reference Point). The low emitters are being penalised and the polluters may continue to pollute. There is no scientific evidence that a blanket rule for nitrogen restriction will be of any benefit.</p> <p>It penalises the low emitters – who will no longer be able to develop their farms (they may develop their farms but they will be unable to stock them with these rules) to help pay for the cost of mitigating against the other contaminants.</p> <p>I oppose the use of overseer as a means of determining the NRP – it relies on a wide number of assumptions and can vary depending on the information that is entered into it. It was never designed to be used for this purpose.</p>	<p>We seek that the Nitrogen Reference Point and use of OVERSEER are removed from the plan in their entirety.</p> <p>Adopt a sub-catchment approach to addressing contaminants that are relevant to each farm, not a blanket restriction of one particular nutrient that may not even be relevant to the water bodies in that sub catchment.</p> <p>If nitrogen discharges from a property do have to be allocated then base the allocation system on the natural capital of soils and the water quality outcomes that are to be achieved for each sub catchment. Do not allocate based on 2014/15 or 2015/16 land use or, grandparenting discharges to these</p>

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		<p>The years chosen to determine the NRP value were drought years, thus stocking rates were very low – this will mean we are restricted to carrying lower numbers of stock (cattle in particular) going forward.</p>	<p>years especially for lower leaching land uses such as drystock.</p> <p>Use FEP's to determine what would work best on each farm, and science to determine which contaminants are an issue in each sub-catchment.</p> <p>Amend the rules so that they are effects and science based, not based on grandparenting (holding land uses and land users to historic leaching rates, stocking rates, and land uses).</p>
<p>3.11.4.5 Sub-catchment scale planning</p>	<p>We support this Implementation method</p>	<p>This is a sensible and practicable approach to controlling contaminant discharge and gives each farm, and catchment, ownership over their future.</p>	<p>We seek that the plan change should not be implemented until the scientific data around which contaminants are causing water quality decline is available for each sub catchment.</p>
<p><i>Insert new Objectives, Policies, and Rules to enable, support, and incentivise sub catchment planning and land and water management</i></p>	<p>Oppose PC1</p>	<p>Subcatchment approaches to managing land and water resources are a sensible and practicable approach to controlling contaminant discharge and gives each farm, and catchment, ownership over their future.</p>	<p>Include new or amend existing Objectives, Policies, methods, and rules to enable catchment groups to manage their land and water resources to achieve water quality outcomes while providing for their economic and social wellbeing and sustainability</p> <p>We seek that the plan change should not be implemented until the scientific data around which contaminants are causing water quality decline is</p>

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			available for each sub catchment.
<p><i>Stock exclusion</i></p> <p><i>Policy 3, Policy 4, Rule 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.4 and Schedule C</i></p>	<p>I support with amendments</p>	<p>The national waterway accord <u>recommends</u> that slopes up to 15° be fenced, this should also be applied to healthy rivers</p> <p>The governments recently released clean water document (February 2017) includes recommendations for national stock exclusion, which is much more sensible and makes much of the plans more achievable. There are many areas of water on our farms that would require fencing under these rules that seem nonsensical as stock never venture near them. Fencing them would be financially crippling and pointless. All our farms have comprehensive water reticulation systems, and tailored critical source area management.</p> <p>One of our farms is classed as 6e, and were we to fence all the waterways as defined in PC1, we have no guarantee that we will not be forced to plant it into forestry in future plan changes, and then whether we could actually harvest that forestry in the future.</p> <p>The timing required along with the financial input are out of our ability to achieve</p> <p>This rule does not support objective 2 of the plan as it would be socially devastating for the farming community and the communities and small townships who rely on us.</p> <p>At the time of writing there is no clear</p>	<p>Change the stock exclusion requirements so that they are consistent with the Governments Clean Water Report (February 2017).</p> <p>Change the slope requirements to no greater than 15° as per the Clean Water Report.</p> <p>For cattle and deer on land between 3 and 15 degrees slope change the exclusion requirements so that they only apply to all permanently flowing waterbodies 1m wide or greater.</p> <p>Extend the timelines and give certainty to those of us with land classed as at risk of erosion that we are not wasting our money and resources in fencing it due to the possibility it may be converted to forestry in future plan changes.</p> <p>Let the individual FEP present mitigations against contaminants, relevant to each farm, rather than a blanket approach.</p> <p>Any waterway fencing should be subsidised by the Waikato Regional Council</p> <p>Enable stock to enter waterbodies if they are being actively managed</p>

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		understanding of how a slope will be classed	across the waterbody and the waterbody is not crossed by stock more than 3 x week?
<i>Removal of northeastern (Hauraki) portion of Plan</i>	Oppose	Removal of a significant section of the lower catchment from PC1 means that people are now not able to determine whether this plan will achieve it objectives and whether the costs on individuals is appropriate.	Place the plan process on hold, or withdraw the plan in its entirety until the lower catchment is re inserted into the plan at which time the plan can be notified as a whole.
<i>Farm Environment plans Policy2, Rules 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.4, 3.11.5.5, 3.11.5.6, 3.11.5.7 Schedule 1</i>	Support with amendments	Support the intention of using FEP to identify critical source areas on farm and target management actions and environmental mitigation to address these issues. Are concerned around some of the strict standards being applied through the rules and FEPs, including the timeframes.	Amend FEP requirements to: <ol style="list-style-type: none"> 1. Change thresholds for mandatory stock exclusion to nationally recommended standards (Clean Water Report February 2017). <ol style="list-style-type: none"> a. Only applies up to a slope of 15 degrees for deer and cattle b. Only applies to waterbodies 1m or wider for cattle and deer on land between 3 and 15 degrees slope 1. Accept that fencing required above the 15 degree threshold for intensive farming operation (>18su/ha). eg winter cropping and strip grazing of dairy cows on hill country. 2. Rather than the currently proposed input standards

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			<p>(riparian setbacks, limitations on cultivation etc), mitigations should instead be set on a farm by farm basis and focused on management of "critical source areas"</p> <ol style="list-style-type: none"> 3. Rules should be focused on reducing impacts from intensive agriculture >18su/ha rather than applying blunt and inappropriate rules to extensive agriculture 4. FEP's should be produced by the landowner with WRC guidance and support as suggested above for Implementation Methods 3.11.5.3 5. Delete 5(a) and enable flexibility in nitrogen leaching from hill country sheep and beef farming, and land uses which are low impact (at or below 20kgN/ha/yr for example or apply natural capital allocation). 6. Timeframes should be deleted, and instead set through consultation with the farmer taking into account their financial constraints, and the sensitivity of the waterbody to any impact.
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<i>Policy 16</i>	Oppose	We oppose this policy. The ownership of the land should have no bearing on whether the rules apply or not. The issues addressed in this plan are contaminant discharges and the rules should be the same for all regardless of ownership.	We seek that this policy is removed
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Yours sincerely

Print Name:

Signature

Date

Comment [j3]: If a group. The final signature can be 'signed on behalf of the ... group'.