

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.

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 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. We also request you send us a signed original by post or courier.
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- Nicola Jane Kloeten		
Full address 109 Mathers rd, RD1 Te Kuiti		
Email nicola_waugh@yahoo.co.nz	Phone 0276960598	Fax n/a

ADDRESS FOR SERVICE OF SUBMITTER		
Full name: H N Kloeten Ltd		
Address for service of person making submission: 109 Mathers rd, RD1 Te Kuiti		
Email as above	Phone as above	Fax

TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i>
<input type="checkbox"/> I could not gain an advantage in trade competition through this submission.

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, I would consider presenting a joint case with them at the hearing.

Section Number of the Plan Change	Support/Oppose	Submission	Decision Sought
<i>Please refer to title and page numbers used in the plan change document</i>	<i>Indicate whether you support or oppose the provision</i>	<i>State in summary the nature of your submission and the reasons for it</i>	<i>State clearly the decision and/or suggested changes you want Council to make on the provision</i>
1. Page 20 – Vision and strategy for the Waikato River	Support	Support the overall vision: <i>“Our vision is for a future where a healthy Waikato River sustains abundant life and prosperous communities who, in turn, are all responsible for restoring and protecting the health and wellbeing of the Waikato River, and all it embraces, for generations to come.”</i> Also support the focus on the 4 water contaminants: Nitrogen, phosphorus, e.coli and sediment	Continue with this vision for the water quality of the river
2. Page 15 – Achievement of vision and strategy is intergenerational	Strongly Support	Strongly support the 80 year timeframe to reach the water quality targets. In order to successfully reach the specified targets there needs to be innovation in technology and management practices to ensure targets are met whilst maintaining a vibrant and successful region socially and economically. These will need time to develop and implement.	Continue with the 80 year timeframe and ensure over time there is detailed research on the economic and social implications of various mitigation options available/developed to reach the desired vision.
3. 3.11.3 Policies – Specifically referring to the Nitrogen referencing point	Strongly Oppose	Oppose the use of nitrogen referencing based on the 2014/15 or 2015/16 season as a method of setting the nitrogen discharge allowance. This method of setting the nitrogen discharge allowance provides a significant disadvantage to those land owners who have been aware of and mitigating the impact of their land operations on the environment. For example, comparing 2 farms: Farm A having understood and mitigated the impact of their operation through management decisions and investment in infrastructure such as an improved effluent system and feedpad at a significant expense resulting in a nitrogen leaching of 28 kg N/ha/year are at a significant disadvantage to Farm B who	Limiting nitrogen discharge based on historical nitrogen leaching is an inequitable method of limiting or managing nitrogen discharge into water systems. Any proposed limits should be based on a sub catchment basis taking into account land class and specific contaminants required to be removed in that catchment.

Section Number of the Plan Change	Support/Oppose	Submission	Decision Sought
		<p>have been running a system with little regard to the impact on the environment who has a nitrogen leaching of 40 kg N/ha/year. This disparity in nitrogen discharge allowance will have an impact on land values due to the relative lack of flexibility in the farm with the lower nitrogen discharge allowance.</p> <p>This approach also does not allow properties that are currently underperforming for whatever reason to be developed into productive blocks of land. This will have a significant impact on the value of this land. An additional consequence of this is that it will be more difficult for young people to progress to land ownership in the future. Historically people have purchased these underperforming blocks as a first farm and invested a lot of their own time to improve the productivity of these blocks resulting in an increase in the return on investment and capital gain and consequently equity growth. Under the proposed plan this will be much more difficult as the productivity of these blocks will be capped based on the historical nitrogen leaching values. This could potentially have a significant impact on the success of the agriculture industry as a whole. If the pathway to farm ownership is significantly limited by not enabling this equity growth by purchasing an underperforming farm and improving the productivity it will be much more difficult to attract highly motivated, highly innovative young people into the industry.</p>	<p>By developing a methodology by which similar land within a catchment is allocated the nutrient limits regardless of historical performance will still provide these opportunities to invest in land and improve the productivity of the land resulting in an increase in equity.</p>
4. Page 43 - Heavy reliance on use of Overseer	Oppose	<p>The current proposal has a significant reliance on Overseer for developing the nitrogen reference point. Although identified as the best model currently available it has serious and significant flaws when used in the proposed manner. As it is a research based model (which it needs to be if used for this purpose) it requires robust research based data to provide into the program to model the nutrient flows in the farming system. In order for this data to be robust and accurate to feed into the model the research for any new crop, management option or technology needs to be carried out on various soil types and climatic conditions over a number of years to</p>	<p>Based on the reports available from the Technical Alliance group there does not appear to have been in depth research looking at the big picture and comparing the approach of limiting outputs through the use of the Overseer model compared to the approach of limiting some inputs or focusing more on 'Best management practice'. Would limiting some inputs such as total nitrogen imported into system (including Feed imported)</p>

Section Number of the Plan Change	Support/Oppose	Submission	Decision Sought
		<p>provide this robust data. Consequently any new technologies or management changes take a number of years before they can be included into the Overseer program which means in the years while the research is being carried out there is no benefit, in fact more likely to be a disadvantage, for farmers to uptake these new practices.</p> <p>Due to the complexity of the model there is also a significant number of input variables all of which will impact on the nutrient outputs. How the data is interpreted and inputted into Overseer can vary from operator to operator. In order to address this guidelines have been identified and requirements of ways data can be implemented have been developed. However, this then limits the accuracy of the modelling of each individual farm system into the program in some cases significantly impacting on the outputs</p> <p>The implementation of an auditing system to ensure the accuracy of the data input and interpretation will be difficult and take significant amount of time therefore adding significant compliance cost to the industry.</p> <p>The plan does not clearly state how the Waikato regional council will deal with changes to the version of Overseer and the resulting changes to the nitrogen leaching outputs for each farm. This effectively will change the nitrogen reference point every time a new version of Overseer is released.</p>	<p>whilst excluding stock from waterways etc result in more clarity, easier to implement policy whilst achieving similar environmental outcomes?</p> <p>The whole approach needs to be clearly compared looking at how these methods could be implemented and the effect at the farm, community and region level and the results clearly shared with the public. This may then provide some confidence if Overseer is the best model to be used but currently there are many questions about its use in a regulatory framework.</p>
5. Page 51 – Fencing waterways and setback areas	Partially oppose	<p>There is a requirement for all cattle, deer, horses and pigs to be excluded from all waterways with the required setback ranging from 1 metre to 3 metres. The concern is not around the exclusion of stock as this will have benefits to water quality but of how it is proposed these corridors will be managed.</p> <p>A significant consequence of excluding stock from waterways is the establishment of weeds throughout these corridors. Specifically the growth of aggressive weeds such as (but not limited to) the Japanese walnut, tutsan, blackberry, and convolvulus. If not managed these weeds</p>	<p>There needs to be further information on who is responsible for managing the waterway corridors that are proposed. There needs to be research into how these weed species should be managed and the impact of these proposed management practices on the water quality.</p>

Section Number of the Plan Change	Support/Oppose	Submission	Decision Sought
		will spread and overrun many of these corridor areas. It is not clear whether the management of these will be up to the individual land owners or the Waikato Regional Council. If these weeds are going to be managed through the use of herbicides there will be a significant increase in the amount of herbicide ending up in our waterway systems	
6. Cultivation of land greater than 15 degrees	Support	Agree that cultivation of steep land is not good for the environment or for the economics of the farm system	

SIGNATURE		OF	SUBMITTER
<i>(or person authorised to sign on behalf of submitter)</i> A signature is not required if you make your submission by electronic means.			
 Signature		Date 08/03/2017	
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.			