

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):** Jack Williamson

**Phone (cell):** 0272284964

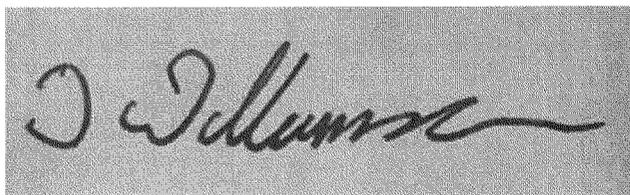
**Postcode:** 3293

**Email:** Jack@WDE.co.nz

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.**

**If others make similar submissions, I would consider presenting a joint case with them at the hearing.**



08/03/2017

Signature

date

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

### Introduction

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

My name is Jack Williamson, I am 25 years old and have grown up on our Family farm just outside the current catchment areas being discussed in this erroneous plan. I am submitting regarding my strong objections to parts of this plan.

Firstly, in my view I feel this plan pitches the problem to the agriculture sector and puts townspeople against those from rural backgrounds. While I believe that the most intensive farms around the Waikato could look at doing better, I do not believe that the plan proposed will improve matters relative to the significant problems it introduces.

From my understanding of the plan, it does not seem to require significant change to the urban areas of the catchment, this is not acceptable to me. I often run along the riverbank of the Waikato River through Hamilton city and often note the smell of sewage which is clearly seeping into the river. To my knowledge the Raglan harbour has been closed to shellfish collection multiple times due the accidental discharge of untreated sewage directly into the harbour. If this happened on a dairy farm they would be likely fined.

I detest the idea that the proposal still stands for the plan yet the people it is trying to satisfy have removed a massive proportion of land from the plan. If some landowners have the option to exclude themselves from the plan, all landowners should have this same right.

I feel that the plan does not take into account the massive change in the views of landowners about what is now acceptable. In the last 10 years farm owners have begun to take the issues of environmental sustainability much more seriously and this is especially true with my generation.

From my point of view, my generation is going to be burdened with a plan that is not economically sustainable and will result in massive injury to the sustainability of the industry itself.

Low intensity dry stock farming is already fraught with economic uncertainty, the implementation of a rushed and unsuitable plan could finish it.

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

<p><b>Nitrogen Reference Point</b></p> <p><i>Objectives 1 and 4 Policies 2 and 7 Rules 3.11.5.2 to 3.11.5.7 Schedule B, and any other related provisions</i></p>	<p>Oppose</p>	<p>The nitrogen reference point system is completely erroneous. This is derived on the basis that the nitrogen reference point given to each property is proposed to be given based on a very short period (one or two years). This is an extremely short period of time in the context of an agricultural operation where things are planned and carried out in orders of magnitude greater timeframes (ten or twenty years). It is common for a farm to defer their fertilizer application for a year should the farm have to find or make available, funds to carry out a large project. A bridge or renovations to a woolshed or the like.</p> <p>If the farm was in the unfortunate position that they did this on the year that they deferred their application of fertilizer they will be perpetually stuck with a low nitrogen reference point.</p>	<p>I do not believe that a nitrogen reference point system is fundamentally fair and oppose the basic idea of it. However, should it be found to be essential a much longer window should be analyzed to determine each property's nitrogen reference point.</p>
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<p><b>Nitrogen Reference Point</b></p> <p><i>Objectives 1 and 4 Policies 2 and 7 Rules 3.11.5.2 to 3.11.5.7 Schedule B, and any other related provisions</i></p>	<p>Oppose</p>	<p>The use of Overseer in the plan as a means of quantifying property's nitrogen output.</p> <p>On Overseers own website, There are multiple references pertaining to the fact that this software</p> <ul style="list-style-type: none"> <li>A. Was not designed for regulatory use.</li> <li>B. Does not produce absolute values that can be compared between properties.</li> <li>C. Has a level of uncertainty to the order of 30% for its outputs.</li> </ul> <p>What this boils down to is the fact that overseer is simply not designed for the purpose that this plan proposes. The first rule of modeling is that the outputs will only be as accurate as the inputs. As there is a very limited understanding how nitrogen actually interacts with the environment the model simply cannot produce accurate results. If the software was an order of magnitude more accurate (3% uncertainty) It would be within the realms of being acceptable.</p>	<p>Clearly more science needs to be undertaken in this field to get the software to a point that it is remotely feasible to be put into regulatory use.</p> <p>It should be excluded from the plan until everyone is satisfied that the software is acceptable to all parties.</p>
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<p><b>Nitrogen Reference Point</b></p> <p><i>Objectives 1 and 4 Policies 2 and 7 Rules 3.11.5.2 to 3.11.5.7 Schedule B, and any other related provisions</i></p>	<p>Oppose</p>	<p>While my family is not farming to an 'Organic' or similar strict plan, we do our absolute best to conserve our environment to the best of our ability.</p> <p>We apply zero nitrogen fertilizer, install zero crops, spread zero effluent and generally farm at a relatively low intensity.</p> <p>This has now come back to bite us as the plan proposes we will be capped at our super conservative current nitrogen output. We are the type of farm that does the least damage yet we are getting the lowest cap. This means our farm value will suffer significant injury.</p> <p>Had we cut all our native bush down, spread urea at a high rate twice a year, planted maize on all the ground we could and run our farm at a massively more intensive level, we would now be much better off as we would be allowed to continue to do so now.</p>	<p>The plan should be put in the bin and a new one proposed which is fair to all farms.</p> <p>Particularly those farmers who have been actively trying to reduce their nitrogen output for some time in the belief that they were doing the right thing.</p>
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<p><b><i>The plan as a whole</i></b></p>	<p>Oppose</p>	<p>My personal thoughts are that the people proposing this plan are in a dangerous position. I think this because they are looking to employ a plan that is based on incomplete science and understanding. There are multiple lessons on this very topic in the Hamilton City Councils history concerning environmental issues.</p> <p>I recently read a report published by either the Waikato council or Environment Waikato discussing the history of the lake. The report included information about a large amount (around ten tons) of mercury sulfide being spread around the lake to control the weed and algae bloom problems the lake was experiencing.</p> <p>This was deemed a mistake within ten years, however, the problem persisted so for most of the 1970s 2-4-D and Parquet was applied at high rates to the lake by means of helicopter to control the problem. It is now accepted this was also a big mistake.</p> <p>What we do know is while we look back now and think that it was a stupid idea and obviously a mistake, we can be sure that at the time this was cutting edge science.</p>	<p>I strongly urge the authors of the proposal to satisfy themselves, experts, science and the people the plan will affect that they are selecting the correct path to travel.</p> <p>No one wants to be responsible for making a decision that was the wrong one when they don't need to.</p> <p>More science needs to be undertaken to alleviate more uncertainty about what the proposed plan will mean.</p>
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**WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS**

<p><b>Stock Exclusion</b></p> <p>Policy 2 Rules 3.11.5.2 to 3.11.5.7 and Schedule C, and any other related provisions</p>	<p>Support with amendments</p>	<p>My family has undertaken and completed many Kilometers of fencing to exclude stock from waterways where practical and even in some cases at considerable difficulty.</p> <p>This shows our commitment and support to exclude stock from waterways where possible. As many people have pointed out some parts of farms are virtually impossible to fence off. I do not see how farms could be expected to fence off all waterways and especially not minor streams. 90% of these would have to be done completely by hand due to the nature of the terrain and at an enormous cost due to the sheer quantity of fencing that would be required.</p> <p>We have always believed that having stock that are farmed at a low intensity have an insignificant impact on these small streams.</p>	<p>Farmers should be offered other solutions to the idea of complete stock exclusion where simply fencing the waterways off is not practical or feasible.</p> <p>While I agree that 50 dairy cows should not be allowed to stand in a stream and destroy it, 3 dry stock cattle wandering through it once in a while is no more damage than 3 tourists.</p>
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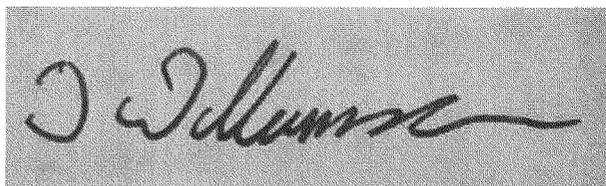
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<p><b>Farm Environment Plans</b></p> <p>Policy 2, Rule 3.11.5.3, 3.11.5.4, Schedule 1</p>	<p>Support with amendments</p>	<p>While I obviously support farms being respectful for the environment in which they operate, I also believe they should be allowed to operate in a profitable and flexible way.</p> <p>Farms should be offered more options to manage their sustainability than the proposed plan allows.</p>	<p>Sustainability should be the watchword – that being sustainability in terms of environment and also economic sustainability.</p> <p>I believe that should the nitrogen reference point system be introduced, many farms will become unsustainable which I understand happened surrounding Taupo.</p>
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Yours sincerely

Jack Williamson

A rectangular box containing a handwritten signature in black ink. The signature is cursive and appears to read 'J Williamson'.

08/03/2017

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Signature

Date