

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

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 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
Emailed to	healthyrivers@waikatoregion.govt.nz <i>Please Note: Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.</i>
Online at	www.waikatoregion.govt.nz/healthyrivers
We need to receive your submission by 5pm, 8 March 2017.	

YOUR NAME AND CONTACT DETAILS

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ADDRESS FOR SERVICE OF SUBMITTER

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Address for service of person making submission		
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TRADE COMPETITION AND ADVERSE EFFECTS *(select appropriate)*

I could not gain an advantage in trade competition through this submission.

I WISH TO BE HEARD IN SUPPORT OF THIS SUBMISSION



SUBMISSION POINTS: General comments

We farm in the King Country within the WRC

Our families have farmed in New Zealand for many generations since the 1850's and have a passionate regard for the land and our environment.

We support improvement in water quality in the Waikato/Waipā catchments

We farm

- **950ha effective intensive property - 80% Cattle 20% sheep**
- **1600ha effective hill country property – 50% Cattle 50% sheep**
- **150ha Forestry**

We have farmed in the King Country for over 30 years and in that time have spent approximately \$300,000 fencing off bush, streams, and planting poplars. We have over 500ha in native bush (a lot of it in smaller blocks) fenced off and many kilometres of streams fenced. Further work is planned. We have been involved in instigating and running land care groups and a possum control group in our community with assistance from WRC.

We need an approach that works with farms and landowner that is affordable, practical and has targets that can be proven to be attainable without having a long term detrimental effect on our rural communities. An outstanding example of this is the Waiangaroa Harbour Care project.

Many farmers such ourselves have bought land and at significant cost to their business, improved the environmental foot print of that land. They have responded to signals from local and central government for their investment decisions. If all New Zealanders want to change those rules, the burden of those costs should fall on all New Zealanders not just land owners. Farmers need to be profitable to enhance their environment

We are concerned with the social and economic implications Plan Change One will have on our region relative to the environmental outcome. More specifically, more science and monitoring at sub catchment level needs to be done and more consideration made for the cost and practicality of the rules. \$14 million has been spent to date on this project by WRC. When considering the huge amount that has been achieved voluntarily with the Waiangaroa Harbour care group, think how this money could have been better spent on real environmental outcomes

I set out my concerns more specifically in the table below.

SUBMISSION POINTS: Specific comments

Page No	Reference (e.g. Policy, or Rule number)	Support or Oppose	Decision sought Say what changes to Plan Change 1 you would like	Give Reasons
27	Objective 1 80 year water quality attribute targets in table 3.11.1	AMMEND	Target needs to be attainable and science based. Use science and monitoring data to determine what outcomes are achievable and in what time frames. This will need to be an ongoing process as mitigation measures are put in place	Not enough science has been done and experience gained as to what targets are achievable. Example: Flooding and heavy rainfall events will make E.coli thresholds impossible to achieve. WRC acknowledges this in their current swim ability web site.

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28	Objective 2 Reasons for adopting objective 2	AMEND	<p>Target needs to be attainable and science based.</p> <p>Use science and monitoring data to determine what outcomes are achievable and in what time frames.</p> <p>This will need to be an ongoing process as mitigation measures are put in place</p>	<p>It is unknown what the cost is to communities and business.</p> <p>Quote Plan Change 1 “full achievement of the table 11.1.2096 water quality attribute targets may require potentially significant departure from how business and communities currently function”</p> <p>The regions prosperity has been built on continued investment, innovation and development in agriculture. We need clarity of outcomes to invest</p>

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33	Policy 9	<p>I Support</p> <p>b. assessing the reasons for current water quality and sources of containment discharges</p> <p>c. encouraging cost effective mitigations where they have the biggest effect on improving water quality</p>	<p>This policy should form the basis of whether waterways should be fenced or nitrogen mitigation is necessary. Alleviate the need for blanket exclusion of cattle from all waterways or restricting all farms from their nitrogen reference point</p>	<p>I support the principal of sub catchment mitigation based on a tailored approach (see policy 2a on page 30 "tailored risk based approach to define mitigation actions</p>

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45	Land use change 3.11.5.7	Oppose	Base land change on land use capability plans and farm environment plans also considering current sub catchment levels of contaminants	<p>It penalises those land owners who have yet to realise the potential of their land, stifling growth of their business and being unable to adapt to changes and volatility in agricultural markets. Consequence – Lack of profitability and devaluation of land</p> <p>There is a potential risk that only allowing one type of land use without alternatives, could make land worthless</p> <p>Example: Forestry has potential biological incursions that could devastate pine plantations making land worthless with no alternatives. Currently red needle blight is having a big impact on growth or radiata pine forests and is unknown how significant it will be in the future.</p> <p>Potential invasions of:</p> <ul style="list-style-type: none"> • Pitch Pine Canka which has destroyed radiata pine in native USA • Pine Beetle Borer which has devastated significant areas of pines in North America <p>The cost of gaining consent to change land use is most likely to be prohibitive.</p>

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33	Policy 10	Support a and b		<p>It is essential that the plan change “will provide for the continued operation of regionally significant infrastructure and industry” which will include agriculture.</p> <p>This needs to be firmly recognised as part of Plan Change 1</p>

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			<p>catchment.</p> <p>Work on a sub catchment basis and do more research and monitoring to determine where the N Levels are at.</p> <p>Use farm environmental plans and land use capability plans to set target discharge levels.</p>	<p>process to change farming policy in many cases will negate any gains. Profitable farming requires the ability to change policy to allow for volatile climate and market conditions. Locking into a Nitrogen reference point will restrict even subtle changes which are part of normal farm practices.</p> <p>Example: Changing stock numbers at certain times of the year because of a dry autumn or a very good growing spring.</p> <p>A low Nitrogen Reference point penalises those farmers who have historically low impact on the environment and will have a consequence devaluing of their land through limiting the potential. Locking in NRP will stifle innovation and change of land use.</p> <p>NRP could have a perverse effect of restricting land use change that could mitigate sediment and E.coli contamination. Example; by restricting a change to cash cropping or horticulture and only allowing the current livestock policy.</p> <p>The goal is to improve all water quality in all sub catchments not just the lower Waikato River. For many of the sub catchment nitrogen is not an issue but E.coli and sediment are. Please refer to the tables on pages 57 – 66</p>
50	Schedule C: Stock Exclusion	OPPOSE	<p>Use a tailored approach as in policy 2a page 30</p> <p>Use of farm environment plans and land</p>	<p>The cost of excluding cattle from all permanent waterways and providing alternative water sources will make some farms financially unviable.</p>

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			<p>capability plans, these will detail soil types, stream bed types, rain fall, livestock policy and intensity and how they affect contaminant run off which will determine the relative benefit of excluding stock from relevant water ways</p> <p>Fencing water ways where there is a real benefit relative to the cost</p> <p>There needs to be alignment with the national water policy which is suggesting fencing waterways only on land up to a 15 degree slope unless there is a critical source identified.</p>	<p>Case studies in our region have shown examples of costs of \$750,000 and \$530,000 on hill country farms. [This can be elaborated on in presentations to submission hearings]</p> <p>The farming of only sheep will make these businesses unsustainable financially (given the volatility of sheep meat and wool returns) and is an unsustainable production system.</p> <p>Example: Running only sheep on King Country/Waikato pastures is very difficult, causing large parasite burdens and it is hard to maintain pasture quality resulting in low production.</p> <p>There is very little benefit from the huge cost of excluding cattle from some waterways.</p> <p>Example: Small stony bottom streams running through extensive hill country with ash and rubble soils carrying low cattle numbers will have very little risk of contaminants affecting the waterways.</p> <p>Other waterways will need fencing: An intensive cattle only property with clay and mud stone soils will have a large impact on water quality and surrounding streams</p> <p>Policy 4 page 31 alludes to further changes to mitigation which may render the previous works obsolete; ie Land that has waterways fenced being forced into planting into pine forest or regenerating into native.</p>