

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

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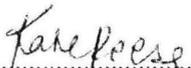
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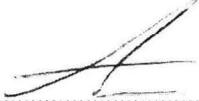
Email: kate@teamreese.co.nz

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

We wish to be heard in support of this submission.

If others from the Onewhero / Wairamarama area make a similar submission, we would consider presenting a joint case with them at the hearing.

Signed.....  Date 08/03/2017

Signed.....  Date 8/3/2017

Aaron Reese

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| <i>The specific provisions our submission relates to are:</i> | <i>Our submission is that:</i> | <i>The decision we would like the Waikato Regional Council to make is:</i> |
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| <p>Schedule B – Nitrogen Reference Point</p> | <p>We oppose the methods of calculating the Nitrogen Reference Point (NRP).</p> <p>The reasons we think this are:</p> <ul style="list-style-type: none"> – The NRP will be based on recent farm management practices rather than the land’s natural capabilities. – The methods of calculation are not fair and equitable across farms of similar soil type, climate and topography. – New farm owners are at an immediate disadvantage as they ‘inherit’ the NRP from the previous owner. | <p>We would like to see the methods of calculating the NRP amended as follows:</p> <ul style="list-style-type: none"> – Consider the <i>topography</i> of individual properties. We think neighbouring farms of similar soil type, climate and <i>topography</i> should have the same NRP/ha. How the NRP for each farm is managed will be determined by their respective Farm Environment Plans. For example, the nitrogen effects of cropping may be offset by a reduction in stock numbers, or by planting an area of trees etc. |

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| <p>Schedule C – Stock Exclusion, clause (2)</p> | <p>We oppose the ambiguity of this clause.</p> <p>The reason we think this is:</p> <p><i>... cannot be within one metre of the bed of the water body (excluding constructed wetlands).</i></p> <ul style="list-style-type: none"> – It is unclear if a different rule of distance applies to constructed wetlands. | <p>We would like Schedule C, clause (2) amended as follows:</p> <ul style="list-style-type: none"> – Explain why constructed wetlands are excluded from the stated rule of distance, and specify a rule of distance that does apply (if any). |
| <p>Schedule C – Stock Exclusion, clause (3)</p> | <p>We oppose the ambiguity of this clause.</p> <p>The reason we think this is:</p> <p><i>Livestock must not be permitted to enter onto or pass across the bed of the water body, except when using a livestock crossing structure.</i></p> <ul style="list-style-type: none"> – ‘Livestock’ could mean those animals excluded from water bodies, or <i>all</i> livestock on the property. | <p>We would like Schedule C, clause (3) amended as follows:</p> <ul style="list-style-type: none"> – Clarify ‘Livestock’. Does it mean those animals excluded from water bodies, or <i>all</i> livestock on the property? |
| <p>Schedule C – Stock Exclusion, list of water bodies</p> | <p>We oppose the ambiguity of the list of water bodies.</p> <p>The reason we think this is:</p> <ul style="list-style-type: none"> – Swamps are not mentioned, although we suspect these are covered under <i>wetlands</i>. – There is no mention of constructed dams / ponds / sediment traps. | <p>We would like the list of water bodies amended as follows:</p> <ul style="list-style-type: none"> – Further define wetlands in list item (iii) – State how constructed dams / ponds / sediment traps are affected. – In addition to amending the list of water bodies, we think the definition of <i>wetlands</i> should be added to the Glossary of Terms. |

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| <p>Schedule C – Stock Exclusion</p> | <p>We oppose the rules and timelines set by Schedule C.</p> <p>The reasons we think this are:</p> <ul style="list-style-type: none"> – We have two <i>named</i> rivers and eight <i>unnamed</i> rivers on our 315ha hill-country property (according to the WRC Water Classification map at http://giswrcmaps.waikatoregion.govt.nz/WRCMaps/Full.aspx?variant=Water-Classification). The named rivers measure a minimum distance of 3.0km. The unnamed rivers measure a minimum distance of 3.5km. In addition to these, we have several smaller tributaries, and numerous swamps and constructed dams/ponds. To ask us to exclude cattle, horses, deer and pigs from <i>all</i> of these water bodies, and by 1 July 2023 is extraordinary and unrealistic. – The farm is divided into 48 paddocks of various sizes and contour, a small number of which have water reticulation. All of the defined water bodies are sources of water for our stock. We would need to install water reticulation to paddocks before stock could be excluded from the defined water bodies. – We’re only 8 months into the business of farming and are servicing sizeable debt. The cost of excluding stock from the defined water bodies <i>and</i> of installing water reticulation in the paddocks from which the stock’s water source has been removed, would be crippling. Especially if it all had to be implemented by 1 July 2023. – The exclusion of stock from <i>all</i> defined water bodies is extreme, and not logistically and financially viable on hill country farms. – We also need to consider soil conservation on the steeper slopes of our farm, which will come at significant cost. – We are concerned there is not enough scientific evidence to support the exclusion of stock from <i>all</i> defined water bodies. | <p>We would like the rules and timelines set by Schedule C amended as follows:</p> <ul style="list-style-type: none"> – Cattle, horses, deer and pigs should be excluded from water bodies with a continual flow of surface water wider than 1m on average, rather than <i>all</i> of the defined water bodies. – There should be more focus on installing water reticulation, than on stock exclusion. Access to a clean supply of water would reduce the likelihood of stock trampling wet areas. Stock would prefer to drink from a trough, than from a swamp or small stream. – Installing water reticulation not only improves water quality, but increases the productive potential of the farm (see https://www.mpi.govt.nz/document-vault/15478). This would be an attractive alternative for farmers. – The timeline for change needs to be realistic and should be covered in the property’s Farm Environment Plan. As hill country farmers, we face extra challenges posed by the size and contours of our land. Fencing and water reticulation will need to cover significant distances over difficult terrain, and will cost hundreds of thousands of dollars. – Partial funding by the WRC or central Government would show a willingness to work <i>with</i> landowners, rather than just creating rules and regulations. |
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| <p>3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme</p> <p>3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme</p> <p>Schedule C, clause (4)</p> | <p>We oppose the timelines imposed by the plan.</p> <p>The reason we think this is:</p> <ul style="list-style-type: none"> – We are located in a Priority 1 sub-catchment (Opuatia, sub-catchment number 11). Our limited financial resources will struggle to cover the cost of installing water reticulation, fencing off waterways, preparation of a Farm Environment Plan and the cost of resource consents. | <p>We would like the timelines amended as follows:</p> <ul style="list-style-type: none"> – The Farm Environment Plan (FEP) should outline mitigation timelines specific to the property. This includes the <i>current</i> level of risk and land capabilities and actions that will be taken to reduce the risks going forward. The timelines need to be achievable at a property level and take into account the financial position of the farm. |
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| <p>3.11 Waikato and Waipa River Catchments > Background and explanation > Full achievement of the Vision and Strategy will be intergenerational</p> | <p>We oppose the uncertainty regarding future changes.</p> <p>The reason we think this is:</p> <ul style="list-style-type: none"> – We would like to give future generations the opportunity to farm our property. However, the future of hill country farming is uncertain and at risk of being severely regulated by the Waikato Regional Council. – The changes outlined in Plan Change 1 have already had a negative impact on land values. Will this get worse in future? <p><i>“This second stage will focus on land suitability and how land use impacts on water quality, based on the type of land and the sensitivity of the receiving water.”</i></p> <ul style="list-style-type: none"> – Will there be public consultation before the second stage takes effect? – How many stages are there likely to be throughout the 80 years? | <p>We would like the wording amended as follows:</p> <ul style="list-style-type: none"> – Uncertainty can be alleviated by the Waikato Regional Council committing to public consultation at each stage of the Healthy Rivers 80 year timeframe. |
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| <p>3.11 Waikato and Waipa River Catchments > Background and explanation > Reviewing progress toward achieving the Vision and Strategy</p> | <p>We oppose the uncertainty regarding future changes.</p> <p>The reason we think this is:</p> <p><i>“The staged approach gives people and communities time to adapt, while being clear that further reductions will be required by subsequent regional plans.</i></p> <p><i>The Vision and Strategy contained in each of the three River Acts is required to be reviewed periodically by the Waikato River Authority, which may make changes to insert limits and methods.”</i></p> <ul style="list-style-type: none"> – Will there be public consultation before limits and methods take effect? | <p>We would like the wording amended as follows:</p> <ul style="list-style-type: none"> – Uncertainty can be alleviated by the Waikato Regional Council and the Waikato River Authority committing to public consultation before changes in limits and methods take effect. |
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| <p>3.11.2 Objectives Objective 4 (b)</p> | <p>We oppose the uncertainty regarding future changes.</p> <p>The reason we think this is:</p> <ul style="list-style-type: none"> – We would like to give future generations the opportunity to farm our property. However, the future of hill country farming is uncertain and at risk of being severely regulated by the Waikato Regional Council. – The changes outlined in Plan Change 1 have already had a negative impact on land values. Will this get worse in future? <p><i>“Recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed to meet Objective 1.”</i></p> <ul style="list-style-type: none"> – Will there be public consultation before future regional plan changes takes effect? | <p>We would like the wording amended as follows:</p> <ul style="list-style-type: none"> – Uncertainty can be alleviated by the Waikato Regional Council committing to public consultation before future regional plan changes take effect. |
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| <p>3.11.2 Objectives Reasons for adopting Objective 1</p> | <p>We oppose the lack of values regarding the current and target water quality attributes for many Freshwater Management Units (FMUs).</p> <p>The reason we think this is:</p> <p><i>“Objective 1 sets aspirational 80-year water quality targets^, which result in improvements in water quality from the current state monitored in 2010-2014.”</i></p> <ul style="list-style-type: none"> – What are the current values of water quality attributes? Table 3.11-1 does not include values for all attributes. – Current <u>and</u> target values for chlorophyll, nitrogen and phosphorus are noticeably absent for the site relating to our FMU, <i>Opuatia Stream, Ponganui Road.</i> | <p>We would like the wording amended as follows:</p> <ul style="list-style-type: none"> – Provide an explanation as to <u>why</u> there are no values for chlorophyll, nitrogen and phosphorus for most FMUs. If current data is incomplete, then say so and explain the monitoring/measuring methodology going forward. |
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| <p>3.11.2 Objectives Reasons for adopting Objective 3</p> | <p>We oppose the lack of clarity regarding the measurement and monitoring of actions taken on the land to reduce pressures on water quality.</p> <p>The reason we think this is:</p> <p><i>“... the achievement of the objective will rely on measurement and monitoring of actions taken on the land to reduce pressures on water quality.”</i></p> <ul style="list-style-type: none"> – How will the effect of actions taken on the land be measured and monitored? What tools and technologies will be used? | <p>We would like the wording amended as follows:</p> <ul style="list-style-type: none"> – Specify how the effect of actions taken on land will be measured and monitored. Will it be through Farm Environment Plans (FEPs) and/or consent documents? <p>On a similar note, the use of on-farm water quality measurement tools like NIWA’s <i>Stream Health Monitoring and Assessment Kit (SHMAK)</i> could be encouraged (https://www.niwa.co.nz/freshwater/management-tools/water-quality-tools/stream-health-monitoring-and-assessment-kit). Regular testing will give landowners an idea of how healthy their waterbodies are and how they are changing over time. Local testing will also determine the effect of actions taken on the land to reduce pressures on water quality.</p> <p>On a wider scale, landowners could collaborate with their neighbours to also test the water quality at their respective boundaries.</p> |
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| <p>3.11.2 Objectives Reasons for adopting Objective 4</p> | <p>We agree that the overall cost to people must be sustainable.</p> <p>The reason we think this is:</p> <p><i>“... in order to maintain the social, cultural and economic wellbeing of communities during the 80-year journey, the first stage must ensure that overall costs to people can be sustained.”</i></p> <ul style="list-style-type: none"> – There are a large variety of landowners in the Waikato/Waipā region. The costs associated with Plan Change 1 need to be taken into account for all types of land ownership/use. – The potential effects of Plan Change 1 has already caused stress within our rural community, particularly with regards to the uncertainty of hill country farming in future (affected productivity, land use restrictions, costs associated with complying with regulations, fear of being unable to pay off debt, fear of falling land values and future land classification/suitability). | <p>We would like the following costs to farmers acknowledged:</p> <ul style="list-style-type: none"> – Fencing off waterbodies – Installation of bridges and other crossing structures – Planting riparian areas – Pest management (plants and animals) – Installation of water reticulation – Cost of consents – Membership cost of a Certified Industry Scheme – Cost of creating an approved Farm Environment Plan (FEP) – Cost of procuring a nutrient budget (and Nitrogen Reference Point) – Increased rates – Decrease in farm value – Reduced productivity – Increased debt <p>These ‘extra’ costs need to be sustainable at a property level. There is no ‘one size fits’ all – the capabilities and requirements for one farm will be different to another.</p> |
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| <p>3.11.3 Policies Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding</p> | <p>We agree with clauses (a)-(d), but feel Policy 9 could also include research and development of new mitigation methods and technologies.</p> <p>The reason we think this is:</p> <ul style="list-style-type: none"> - There may be water quality mitigation actions that exist in other parts of the world that may work in the Waikato/Waipā environment. Support and encouragement should be given to those who wish to pursue research projects that benefit the greater Waikato region. | <p>We would like the wording amended as follows:</p> <ul style="list-style-type: none"> - Add an extra clause that supports and encourages on-land research into new cost-effective methods and technologies to improve water quality, including the provision of funding (or a pathway) for on-land research that will benefit the greater Waikato region. |
| <p>3.11.4 Implementation Methods 3.11.4.3 Farm Environment Plans</p> | <p>We agree with the tailored approach to managing risk by using Farm Environment Plans. However, we believe there should also be an alternative recourse if the landowner does not agree with the 'certified person'.</p> <p>The reason we think this is:</p> <ul style="list-style-type: none"> - We are concerned that there may not be many 'certified' persons to assist with the preparation of our Farm Environment Plan, or that they may not be suitably qualified or experienced to be 'certified'. What happens if their recommended mitigations and timelines are unrealistic? | <p>We would like the wording amended as follows:</p> <ul style="list-style-type: none"> - Explain how disputes between 'certified' persons and landowners would be resolved. |

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| <p>3.11.4 Implementation Methods 3.11.4.7 Information needs to support any future allocation Clause (b)(ii)</p> | <p>We agree that 'land suitability' needs to be further defined, but would like there to be industry consultation on the topic.</p> <p>The reason we think this is:</p> <ul style="list-style-type: none"> - We are concerned the Waikato Regional Council will be overly conservative when defining 'land suitability', especially with regard to hill country farmland. - Land suitability should reflect industry best practice. | <p>We would like the wording amended as follows:</p> <ul style="list-style-type: none"> - <i>"Methods to categorise and define 'land suitability', following primary industry best practice."</i> (or similar) |
| <p>3.11.4 Implementation Methods 3.11.4.7 Information needs to support any future allocation Clause (b)(iii)</p> | <p>We agree that tools are needed for measuring discharges from individual properties.</p> <p>The reason we think this is:</p> <ul style="list-style-type: none"> - We would be able to regularly measure the effect of all on-farm mitigations. | <p>We would like the Waikato Regional Council to communicate the sorts of tools that landowners could use, and their associated costs and effectiveness. For example:</p> <ul style="list-style-type: none"> - NIWA's <i>Stream Health Monitoring and Assessment Kit (SHMAK)</i> - https://www.niwa.co.nz/freshwater/management-tools/water-quality-tools/stream-health-monitoring-and-assessment-kit |

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| <p>Table 3.11-1 Short term and long term numerical water quality targets for the Waikato and Waipa River catchments</p> | <p>We oppose the incomplete nature of the table.</p> <p>The reason we think this is:</p> <ul style="list-style-type: none"> - We are not able to compare current values of attributes to target values. The reduction of discharges of contaminants is frequently mentioned throughout the Plan Change 1, but what are the current values? - Only by reading Objective 3 are we able to work out that the <i>Short Term</i> value is a 10% change towards long term water quality improvements. - The definition of <i>Short Term</i> is not immediately apparent (10 years) - Target values for chlorophyll, nitrogen and phosphorus are only included for 9 of 46 Waikato River Freshwater Management Units (FMUs) and none of the Waipa FMUs. - We are not able to compare national bottom line values (from the National Policy Statement for Freshwater Management 2014) to the target values of Plan Change 1. - The introduction from the Healthy Rivers Wai Ora committee co-chairs states: <i>“In achieving [the requirements of the vision and strategy], it sets a higher bar than the National Policy Statement for Freshwater Management 2014’s requirement of wadeable water bodies.”</i> Why has the bar been set higher? - Where does testing/monitoring take place for each FMU? | <p>We would like to see the table amended as follows:</p> <ul style="list-style-type: none"> - Include current attribute values for immediate comparison to target values. - Include the national bottom line values <u>and</u> an explanation why the target values are set higher than the national bottom line values (wadeable vs. swimmable and safe for food collection). - Insert the definition of <i>Short Term</i>, or replace <i>Short Term</i> with its equivalent value of time. - Provide an explanation as to <u>why</u> there are no values for chlorophyll, nitrogen and phosphorus for most FMUs. If there are current values, then include them. - Include the location of testing/monitoring <u>for each FMU</u>. |
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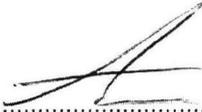
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| <p>Table 3.11-1 Short term and long term numerical water quality targets for the Waikato and Waipa River catchments</p> | <p>We oppose the target values of the water quality attributes and the 80 year deadline imposed to achieve these values.</p> <p>The reason we think this is:</p> <ul style="list-style-type: none"> - Many of the values exceed the national bottom line values (from the National Policy Statement for Freshwater Management 2014). - The targets are ambitious and place enormous pressure on landowners to comply, at significant cost. | <p>We would like to see the table amended as follows:</p> <ul style="list-style-type: none"> - Bring the values in line with the national bottom line values from the National Policy Statement for Freshwater Management 2014, or just above. - Explain why the target values exceed the national bottom line values. |
| <p>Plan Change 1</p> | <p>We agree with the overall vision of the plan.</p> <p>The reason we think this is:</p> <ul style="list-style-type: none"> - We would like to preserve/improve the quality of our waterways for future generations, and retain our clean, green image. | <p>We accept the overall vision of the plan.</p> |

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Yours sincerely,

Kate & Aaron Reese

Signed..... *Kate Reese* Date *03/03/2017*

Signed.....  Date *8/3/2017*
Aaron Reese