

PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 WAIKATO AND WAIPĀ RIVER CATCHMENTS



Submission form on publicly notified – Proposed Waikato Regional Plan Change 1 – Waikato and Waipā River Catchments.

Important: Save this PDF to your computer before answering. If you edit the original form from this webpage, your changes will not save. Please check or update your software to allow for editing. We recommend Acrobat Reader.

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 by email must contain full contact details.</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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TRADE COMPETITION AND ADVERSE EFFECTS *(select appropriate)*

I could not gain an advantage in trade competition through this submission.
I am directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment, and
- (b) does relate to the trade competition or the effects of trade competition.

Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

CLARIFICATION: I could not gain an advantage through these submissions to my knowledge in comparison to the current state of agriculture and environmental policy in the Waikato region; however I am directly affected by the plan change as someone employed in Agricultural Extension and as someone who lives in a community that will be affected by changes in environmental policy.

THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO

Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1 (Continue on separate sheet(s) if necessary)

The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following pages. 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.

Objectives:

All Page numbers related to: Waikato Regional Council Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments actual page numbers.

(<https://www.waikatoregion.govt.nz/assets/WRC/Council/Policy-and-Plans/HR/ReadProposedPlan/Final-PlanChange1-with-insert-of-withdrawal.pdf>)

Objective 5: Mana Tangata pg. 28

"Principal Reasons for Adopting Objectives 1-6/Ngā Take Matua me Whai ngā Whāinga
Reasons for adopting Objective 5 Objective 5 seeks to ensure that this Plan recognises and provides for the relationship of tangata whenua with ancestral lands, by ensuring the other provisions of Chapter 3.11 do not provide a further impediment to tangata whenua making optimal use of their land. Historic impediments included customary tenure in the nineteenth century, public works, rating law, Te Ture Whenua Māori Act, and confiscation. Some impediments or their effects continue currently, including issues of governance, fragmentation and compliance with central and local government regulations such as regional and district plans, or the emissions trading scheme. Land relevant to this objective is land returned through Treaty of Waitangi settlement, and land under Māori title that has multiple owners."

My submission is that I decline the above provision:

If the objectives of Ngā Take Matua me Whai ngā Whāinga are based on protection of the river; it is unreasonable to allow a group with arguably one of the largest inputs on the policy to be exempt from the policy that they are requesting be enforced on others. This is race-based exemption to policy to benefit a group based on their heritage even when that exemption counteracts the stated goals of the policy itself.

Objective 6 a: Whangamarino Wetland pg. 28

a. Nitrogen, phosphorus, sediment and microbial pathogen loads in the catchment of Whangamarino Wetland are reduced in the short term, to make progress towards the long term restoration of Whangamarino Wetland

My submission is that I partially support the above provision

This objective can only lead to excessive regulation and the only necessary section is section 6 b as this makes sure the contaminant loading is "consistent with the achievement of the water quality attribute^targets^" rather than just arbitrarily lowering nutrients in the waterway.

Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens pg. 30

Manage and require reductions in sub-catchment-wide discharges of nitrogen, phosphorus, sediment and microbial pathogens.

My submission is that I partially support the above provision

Reductions should only be required while scientifically proven to be necessary, they should not be a blanket mandatory statement. Outside of this; the elaborations in sections a, b, and c are all positive.

Stated Guidelines and Standards:

“Our rivers reflect what we do on land, and some aspects of water quality are worsening, mainly in more developed lowland parts of the Waikato region.”¹

My submission is that I agree with this provision.

In areas where water quality is safe there should be a longer timeframe given to achieve the goal of no further impact on lake quality as there is no information on the attenuation factor for Nitrogen across the Waikato yet and the 10 year goal has been proposed as no further degradation of rivers by making up for the nitrogen load to come. Farmers trying to reduce nitrogen leaching in the Central Plateau, on pumice country; some of the lightest soils in New Zealand are told that their nitrate leaching will take the same 40 year timespan to reach the lake as farmers on heavy, high organic matter, allophanic soils of central Waikato. On top of that the proposal suggests that they will have to make up for the impact in 40 years of the massive irrigated dairy conversions outside of Taupo as a community. There must be a more pragmatic view taken in order to make this achievable economically for these farmers.

Table 1 - TLG's Water Quality State and Trends²

Contaminant	Impact	Levels and trends
Nitrogen (N)	Levels above water bodies' natural background levels can over fertilise aquatic plants, lead to excessive plant growth, algal blooms and depletion of dissolved oxygen, affecting fish and other aquatic life.	Slowly but steadily rising trends in the Waikato and Waipa rivers over the last 20 plus years N levels downstream of Taupō are especially low, but increase down the length of the Waikato River.
Phosphorus (P)		Waipa: moderate levels, mixed trends Waikato: moderate levels, some improvement P levels downstream of Taupō are especially low, but increase down the length of the Waikato River.
E.coli	Pathogens can present human health risk and cause illnesses such as ear infections or diarrhoea.	Waipa: high levels, no discernible trends Waikato: moderate levels downstream from Karapiro and some deterioration E. coli levels are very low in the upper Waikato.
Sediment	Makes water murky, so less safe for recreation and reduces amount of light for plants and animals living in the water.	Upper Waikato: low to moderate levels, some deterioration Lower Waipa and Waikato: high levels, some deterioration

¹ <https://www.waikatoregion.govt.nz/assets/WRC/Council/Policy-and-Plans/HR/Dip-your-toes/4726ProtectingourwaterSept2016.pdf> page 6

² <https://www.waikatoregion.govt.nz/assets/WRC/Council/Policy-and-Plans/HR/Dip-your-toes/4726ProtectingourwaterSept2016.pdf> page 20

Rules:

3.11.5.1

My submission is that I Support the above provision

Less legislation and requirements for small jobs will allow the environmental consultants to focus on the larger polluters

3.11.5.2

My submission is that I Support the above provision

Less legislation and requirements for small jobs will allow the environmental consultants to focus on the larger polluters

3.11.5.3

My submission is that I Support the above provision with amendments

The FEP requirement to rules based on Overseer and best management practice must take into account that some soil types may be on a good class of land in a catchment that rarely exceeds dangerous water nitrate levels but has characteristics of high leaching. These groups should not be forced to work within the nitrogen reference point before attenuation tests have been done on subsoil characteristics. Overseer should absolutely be a requirement of the FEPs as it is an evolving programme that allows farmers to be regulated based on output rather than input and it gives New Zealand a competitive advantage in environmentally positive international agricultural trade.

3.11.5.4 & 3.11.5.6

My submission is that I Support the above provision with amendments

In cases where land is being traded in order to develop "better" land of one LUC class and retire land of a "worse" Luc class I believe it should be possible for all trading land users trade pollution credits under guarantees of land development. Another option for this is to have some law enforcing review independent from government that makes sure government activities are held to the same level of scrutiny as non-government entities.

3.11.5.7

My submission is that I decline the above provision

There should be absolutely no exception for any racial group from our goal of pragmatically improving water quality. Maori groups should not be allowed to simultaneously increase regulation on other land owners and exempt themselves from regulation. If this policy is identified to be harmful to Maori it should be recognised as harmful to all other groups it affects and there is no justification for race based legislation in this instance.

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PLEASE CHECK that you have provided all of the information requested and if you are having trouble filling out this

form, phone Waikato Regional Council on 0800 800 401 for help

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.

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.
 I do not wish to speak at the hearing in support of my submissions.

JOINT SUBMISSIONS

- If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

- Yes, I have attached extra sheets. No, I have not attached extra sheets.

SIGNATURE OF SUBMITTER

Signature:



Date:

08/03/17

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.