

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:** LANCE COLIN PETERSON ) (Sarah Carswell )  
Sister

**Phone (Hm):** 078778466

**Phone (Wk):** ''

**Postal Address:** 1210 Pungaruru Road RUS TEKURITE

**Phone (Cell):**

**Postcode:**

**Email:**

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.**

Dana Peterson  
Signature

2/3/17  
date



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

<p><b>The specific provisions my submission relates to are:</b></p> <p><b>State specifically what Objective, Policy, Rule, map, glossary, or issue you are referring to.</b></p>	<p><b>My submission is that:</b></p> <p><b>State:</b></p> <ul style="list-style-type: none"> <li>• <b>whether you support, or oppose each provision listed in column 1;</b></li> <li>• <b>brief reasons for your views.</b></li> </ul>	<p><b>The decision I would like the Waikato Regional Council to make is:</b></p> <p><b>Give:</b></p> <ul style="list-style-type: none"> <li>• <b>precise details of the outcomes you would like to see for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you seek</b></li> </ul>
<p><i>Provision</i></p>	<p>I support/ oppose/ and for each whether or not you wish to amend</p> <p>The reasons for this are:</p>	<p>I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below</p> <p>As an alternative I propose</p>

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

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
Provision Schedule B Nitrogen NPP	I <del>support</del> /oppose/ If you support you can support but require amendments	The reasons for this are:	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ <del>amended as set out below</del> As an alternative I propose
			NRP oppose Remove from Plan

The proposed plan needs to be substantially revised. It is unrealistic and it does not consider the two other key components of sustainability which is the economic and social aspects. If all farming operations and business were to comply with the proposed plan, they would not be able to afford it and the burden would impact on the viability of the operations. There would be a negative economic impact on many rural communities, and subsequently effect regional and national economies. We are not opposed to healthy river plans however as a community we need to learn how to continue farming profitable and live in urban areas while at the same time reduce negative environmental impacts.

In New Zealand, there is the perception that all of our rivers' water quality is degrading due to current farming practices and that it is not safe for people to swim in them. However, not all river quality results are worsening, some results are showing that there are improvements under current plans. There are people who have been scared into thinking it is not safe to swim in some of our rivers, when in fact many of our rivers are safe. Some rivers that have unsafe water quality, have never been safe as they are close to storm-water outlets from urban areas.

The impacts of farming on rivers have not been quantified. Where is the quantifying evidence backed up by real science? These conclusions or proposed provisions/targets are based on modelling. There is proof however that many of our rivers in regions are not degrading from agriculture/horticulture practices. It is the waterways near urban areas that are degrading or not improved. Why isn't the focus on urban plans and mitigations? e.g. storm-water and commercial waste etc. It is well known that regionally commercial operations are granted permits for waste disposal into rivers, wouldn't this waste have a more detrimental impact on our waterways? Everyone from all communities should be responsible for rivers, not just left to the farmers. Additionally, it appears unfair that there are exceptions for Maori land, why isn't there exceptions for non-Maori land?

Reducing nitrogen losses even further than current levers could have huge impact on the viability of farming operations and businesses. There needs to be more science around nitrogen leaching and other contaminate losses of sediment, phosphorus and pathogens. The theories are based on modelling. The different mechanisms by which these contaminates get into waterways, makes this nitrate leaching measurement illogical. There is no quantitated proof of the leaching of nitrogen and other losses and the degradation of waterways. Precise quantification is not currently available therefore there are a number of unknowns and assumptions. Therefore, how can these provisions be accepted if the science is not complete. Additionally, the Overseer, itself is not perfect at predicting nitrate leaching. The sole focus is on the trend in nitrate leaching and not on the quantitative amount. Given these assumptions, do we in Waikato want to impact our local and regional economies for the sake of a swimmable water. The cost of the economy and social aspects are too high when the science is incomplete.

These proposed provisions will have an impact on the value of farm land, especially if it is not yet developed but has the potential to be intensified in the future. It seems unfair that if land hasn't been developed due to whatever reason (e.g. ill family member, financial hardship or a new property purchased that has been run down or underdeveloped), that these properties are disadvantaged in terms of future nutrient allocation. The fact that Maori land is an exception to the rule, appears unfair and has the potential of causing racial tensions.

REASON

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<p>Provision</p> <p>Schedule 1 FEP</p>	<p>I support/<del>oppose</del> and for each whether or not you wish to amend <del>FEP</del> FEP</p> <p>The reasons for this are: Support in part</p>	<p>I seek that the provision is: <del>Deleted in its entirety</del> Retained as proposed/ amended as set out below</p> <p>As an alternative I propose</p>
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**WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS**

Provision	I support/ oppose/ and for each whether or not you wish to amend  The reasons for this are:	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below  As an alternative I propose

Although we agree that Farm Management Plans (FMPs) are effective, these provisions proposed in the plan need to be more realistic and flexible. Some farming operations will have many waterways throughout the property and it will be unrealistic to have set back or stock exclusion mitigations. It would be unrealistic for the proposed FMP to be implemented for some operations and will cause that business to experience extreme financial hardship and impacting on the viability of the operation. The realistic approach would be to have a more balanced and tailored approach e.g. case by case. Also to consider subsidies etc.

Some farming operations may not have many options for where they can cultivate etc. The slope gradient may be higher than the rules therefore a case by case ruling should be considered. If the farming operation requires to make hay/silage or crop on a slope more than the plan proposes however there is no other options on the property, then there should be exceptions. It will be costly for hill country properties to fence all waterways including the cost of other mitigations e.g. waterway crossings, reticulation systems, planting for erosion control etc. It may be unviable for some operations to exclude stock from all waterways, therefore there needs to be more flexibility or a more realistic provisions.

The whole cost of what is been proposed should not all go on the farmer as historically the whole Waikato community has benefited from farming over the last 100 years. There needs to be more subsidies if this plan is to be adopted or there needs to be more realistic and flexible provisions proposed. There needs to be more science and measurable approaches around water quality. Everyone in the Waikato community should be responsible for improving the health of our rivers, this should not just be left to the farmers.

more work on sub-catchment approach  
taylored FEP to each farm

Reasons

alternative

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

<p>Provision Objective 2</p>	<p>I support/ <del>oppose</del> and for each whether or not you wish to amend <small>(delete as required)</small></p> <p>The reasons for this are:</p>	<p>I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below <small>(delete as required)</small></p> <p>As an alternative I propose</p> <p><small>What would be an alternative?</small></p> <p>But plan doesn't provide for this</p>
<p>Reasons</p>	<p>These proposals will have a severe economic impact on farming operations and business as well as impacting socially on local communities. More money will need to be spent on mitigations and there will be less returns and viable operations. The economic impact will have a trickle-down effect to farm managers/workers/contractors and their families as well as communities etc. There will be a social cost as there will be a down turn in many local economies. There will be less jobs for farm workers, contractors and rural retailers as money will need to be spent on mitigations and less money made from farm and business operations. There will be higher unemployment, more crime, untenable farming communities, which will all negatively affect other social indicators. Land/farm values will decrease and some farmers/investors could go bankrupt and rural communities/settlements could be abandoned in the future. This in its entirety will effect tourism as rural Waikato will not be pleasant to visit as it will be abandoned and derelict.</p>	

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Provision	I support/ oppose/ and for each whether or not you wish to amend <i>(delete as required)</i>  The reasons for this are:	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below <i>(delete as required)</i>  As an alternative I propose  <i>Which would be an appropriate alternative</i>

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

<p>Provision</p> <p>Policy 6 Restricting land use change</p>	<p>I <del>support</del>/ oppose/ and for each whether or not you wish to amend <small>(delete as required)</small></p> <p>The reasons for this are:</p>	<p>I seek that the provision is: <del>Deleted in its entirety/ Retained as proposed/ amended as set out below</del> <small>(delete as required)</small></p> <p><del>As an alternative I propose</del></p> <p><small>What would be an appropriate</small></p> <p>This policy is in contradiction however to policy (2)(e) which is excessively fast I feel that no more land should be converted to dairy. The plan needs to be tailored a lot more as each farm is run in a different way and land use change should be included in the FEPs and land classification on a sub catchment basis</p>
<p>The provisions of the plan will impact how farmer operators farm their land including opportunities to optimise farms and adapt to changes in markets overtime. Again this will impact economically and socially on local communities as there will be loss of income as there will be less ability to adapt to changes.</p> <p>These provisions could also affect the value of farming properties, especially if it is not yet developed but has the potential for further development. These proposals will impact the ability of farmers to adjust farming operation to reduce other contaminant losses such as sediment, pathogens, and phosphorus, and to fund these mitigations.</p>		

Reasons

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

Yours sincerely

Print Name

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Signature

Date

1A  
To: The Waikato Regional Council

From:

! A → Lance Peterson @ Sarah Carswell ← 1B

Lance Peterson

We are third generation farmers. Our farm consists of 300 Hectares, we are currently buying another adjoining block of 105 Hectares.

This proposed plan will have a direct impact on our ability to farm this land and pay our debts and sustain our good farming practices.

Introduction:

I thank you for the opportunity to submit on the Waikato Regional Plan change 1.

My family Sarah my sister and my Mother and Father are involved with our family farming practices.

We farm in a wonderful pristine area, called Waitanguru. Which is in the Waitomo area. And is 24 Kilometres from Piopio. A dry stock farm. We call Rokanui.

One block of 142 Hectares of our farm is rolling to steep hill country land. The other 155 is rolling hill country with the the new block adjoining this part of the farm. So each farm contour, fertility, stock requirements, plus the type and amount of stock we carry are quite different between each property.

We run 40 percent cattle and 60 percent sheep.

The farm has been very well run, over the last 60 years, with many good clean farming practices, and environmental plans for the future generations having been put into place.

Eg. 20 years ago my mother started planting native flax around the farms lakes ponds and wet land areas. To attract and feed native birds. And improve water quality. We have spent much money and time eradicating wild cats, stoats, ferrets, opossums.

And as a family we have fenced many wet land areas. We are still working on this project, and at the moment we are working with Environment Waikato spending \$28000 on this latest project which is two thirds finished now.

Also with our farming practice we run mobs of cattle in small herds. Being very aware of keeping our steeper faces of land well stabilised.

We have put in lots of water reticulate with an on going plan to have all the farm paddocks having water troughs available to all stock. So keeping creeks and ponds and streams and wet lands free from contamination from stock.

We love our land and have been developing an FEP plan for our land. We have earmarked key areas we want to concentrate on to improve, and keep our land and water ways in the best pristine environment for our future family and families that may come to work this wonderful land. And to protect the many wonderful Native fish, birds, insects, lizards, little bats, and our Native silver belly eels that live in our ponds and on our farm.

If this plan is put into action, we could be forced to reduce our stock numbers. This could impact on our ability to pay for fencing what's left of our waterways and healthy farm practices, and pay our running cost and mortgages on the farm.

The Waikato Regional Plan Change 1 will impact a huge amount of uncertainty of whether our farm will be able to meet our debts, and implement the plan and still be viable in the future for our family farming business. Also could the plan effect the prosperity of our small towns, like Te Kuiti and Piopio.

We LOVE our land and we want our future families to enjoy our beautiful area of land as we do.

We are not just farmers of the land. Our family want to keep our land as environmentally safe and healthy for all of our future generations, and our diverse range of native creatures safe and healthy, also to live along side us, for future generations to see and enjoy as we are.

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Sarah Carswell

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These proposals will have a severe economic impact on farming operations and business as well as impacting socially on local communities. More money will need to be spent on mitigations and there will be less returns and viable operations. The economic impact will have a trickle-down effect to farm managers/workers/contractors and their families as well as communities etc. There will be a social cost as there will be a down turn in many local economies. There will be less jobs for farm workers, contractors and rural retailers as money will need to be spent on mitigations and less money made from farm and business

2B

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predicting nitrate leaching. The sole focus is on the trend in nitrate leaching and not on the quantitative amount. Given these assumptions, do we in Waikato want to impact our local and regional economies for the sake of a swimmable water. The cost of the economy and social aspects are too high when the science is incomplete.

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