

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.

SubForm	PC12016	COVER SHEET	
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		Submission Number	
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FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

SUBMISSIONS CAN BE	
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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	healthyivers@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/healthyivers
We need to receive your submission by 5 pm, 8 March 2017.	

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TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i>
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 effects the environment, and (b) does not 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.

Submission

1. I have reviewed Waikato Regional Council's Proposed Healthy Rivers/Wai Ora Plan Change 1 (PC1) and whilst I support the improvement of water quality in the Waikato/Waipā Catchments, I **oppose** the Plan Change in its current form.
2. I wish to be heard in support of this submission. If others make a similar submission we will consider presenting a joint case with them at the hearing.

We own a property in the Waikato at Tuakau Br catchment that is over 8 hectares in area comprising a range of topography including land over 15° slope. Streams and waterbodies totalling a length of approximately 550 metres cross our land, intersecting with our boundaries at four locations, and requiring at least three crossings to access all of the land.

The property was settled and cleared by the Burnett family who came out in the ship "Helenslee" in 1864 and received ten-acre grants. The property remained in the family ownership until it was sold in 1973 due to lack of funds to repair worn out fences.

Subsequent owners have done little to repair or replace fences or improve infrastructure. When we bought the property in 2010 it was quite run-down, including the house, and a lot of our time and money goes into restoring the property.

We both work full-time jobs so we decided to lease the land to the neighbouring farmer to graze his stock, this provides a minuscule income from the land. From our full-time income, we invest in new fences and infrastructure as we can afford, alternating between boundary fences to keep stock in and streamside fences to keep stock out and allow revegetation to be undertaken.

There remains over 800 metres of boundary fence in various states of repair that still needs to be replaced. Additionally, approximately 450 metres of streamside fencing is required to exclude stock from waterbodies. One existing stream crossing is slowly failing and two new crossing points have been installed in the time we have owned the property.

Approximately half the land is provided with water troughs connected to a rainwater tank at the house and the only other water source available to stock is from the streams. The rainwater tank can quickly run out during extended dry periods.

We strongly believe in increasing biodiversity and promoting the sustainable management of land. At the time of purchase, I contacted the Regional Council to ascertain if they could provide any financial, material or physical support for us to fence and revegetate the streams and waterbodies, We only received a brochure and some technical information.

In 2013, the decision against the provisions in Rural Plan Change 14 to the Franklin District Plan was released, these identified two of the streams that cross our land as “an ecological corridor” on the planning maps. Subdivision opportunity is supposedly available for the creation of Environmental Lots where there is protection and enhancement of ecological corridors to restore and improve the catchment quality and natural environment of the area. However, the subdivision of land under 15 hectares is not provided for so the fencing and restoration of the streams and waterbodies on our property remain subject to what we can afford to complete each year.

In the future, we plan for one of us to leave our full-time job and start a new enterprise on the land. In addition to any District Council consents, we would need to start a new enterprise, any change in land use is a non-complying activity. This means a resource consent will be required and it will be difficult to get approval from the Regional Council. Yet provision has been made for some flexibility of Maori-owned land that has not yet been able to be developed!

Our interests include free-range chickens and dairy goats. The stock unit of a chicken is not even included on the stocking rate table. Both of these operations require a major investment to start up so we need to be certain that we will be able to provide for our economic well-being. The Regional Council consent duration needs to be for an appropriate length of time

Our main area of concern with the Plan Change is that it focuses on only one of the many objectives of the Vision and Strategy for the Waikato River as the primary direction-setting document and does not contemplate the purpose and principles of the Resource Management Act 1991 (RMA) which is summed-up as promoting the sustainable management of natural and physical resources in a way which enables communities to provide for their social, economic, and cultural well-being, health and safety. At the same time as safeguarding the life-supporting capacity of air, water, soil, and ecosystems and managing any adverse effects of activities on the environment. It is possible that some regions may need to sacrifice their welfare or environmental quality, in order to assist sustainability at the national level.

We are particularly concerned about the costs and practicality of the rules and requirements for the Nitrogen Reference Point and the Farm Environment Plan which may result in the underutilisation of production land in the long term. The proposed rules fail to recognise the national importance of high versatile soils (Class I, II, IIIe) and the suitability of these soils for intensive cropping, and the limited locations in New Zealand in which this farming type can occur.

We do not use OVERSEER and have no way of knowing what Nitrogen losses occurred from the farm 2 years ago, let alone what it was in 2014/15 within 10, 20, 50 years' time. This part of the plan restricts Nitrogen losses from the farm as modelled through OVERSEER to the losses from that property for the 2014/15 years. Models have limited value and are primarily used as tools contributing to open discussion and debate. Models help identify gaps in research, flaws in the mathematical equations, and how to account properly for the experience of farmers. There is a huge level of risk in using models to predict the future.

The Plan Change in its current form uses blunt tools to restrict farming activities rather than an approach which promotes best practice measures to reduce discharge to waterways while maintaining the social and economic benefits of rural production. We oppose the use of a Nitrogen Reference Point for a property/enterprise. Regulatory approaches to yield effective environmental management are not always successful as there are no simple solutions to environmental problems.

The first formal attempt in New Zealand to establish an inclusive community-based environmental management strategy for a region has brought together local inhabitants, managers and resource users at Raglan to develop the Whaingaroa Catchment Management Project. The catchment-based scale of the problem provided a physical boundary to stimulate a comprehensive vision of meaningful citizen participation to take place. The community identified issues, established priorities, developed plans for action and identified indicators for environmental improvement with the collaborative support of the local and regional councils. The process was less about preparing and enforcing documents and more about bringing knowledge and practice to direct action, an inclusive democratic process. Although the Whaingaroa Catchment Management Project was also a voluntary project, the scale of the project provided greater environmental awareness in the spaces where the community's daily lives unfold.

A less confrontational, more collaborative, and more effective way to manage freshwater is needed. This is a problem that has been caused by our forefathers' activities as well as recent farming and community activities. Unlike subsidised farmers in other countries, New Zealand farmers receive little or no government support. Farmers with multiple streams running through their properties would be unfairly burdened with the cost of fencing regardless of physical or economic circumstances.

Therefore, New Zealand needs to be working together to address this problem and the cost needs to be shared by farmers, government(s) and the urban community, as historical and recent practices from a range of sources, has contributed to the problem and the wider community as well as farmers will benefit from any improvements.

Yours faithfully



LEIGH SHAW

The specific provisions of the proposal that my submission relates to are:

No.	Section number of the Proposed Plan Change 1	Support/ Oppose	Submission	Decision sought
3.11.2 Objectives				
4.1	Objective 1 Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	Support with amendments	Support the intention of Objective 1. Oppose the attribute targets set in Table 3.11-1. The attribute targets are too prescriptive and should align with the National Policy Statement for Freshwater Management (NPS-FM) and Waikato River Authority’s (WRA) Vision and Strategy. Objective 1: <ul style="list-style-type: none"> • Does not consider all contaminant sources holistically • Includes flood/high flow conditions in water quality target data which are considered outliers • Does not take into consideration the variability associated with sub-catchments i.e. climate and soil type 	Retain the long-term restoration and protection of water quality for the Waikato and Waipa rivers. Amend PC1 to be holistic and include all sources influencing the health and wellbeing of the Waikato River and its catchments, for example, Koi Carp, point source discharges, and hydro-dams. Remove flood/high flow conditions from water quality target data. Address contaminants on a sub-catchment basis, to enable targeting of the highest omitting sub-catchments.
4.2	Objective 2 Social, economic and cultural wellbeing is maintained in the long term	Support with amendments	Support maintaining the long-term social, economic and cultural wellbeing; this must be a foundation objective in PC1. However, PC1 is not achieving Objective 2 because:	Retain the maintenance of long-term social, economic and cultural wellbeing of the Waikato and Waipa catchment communities. Withdraw PC1 until the Hauraki Iwi area and the WRA’s Vision and Strategy has been amended.

			<ul style="list-style-type: none"> • The section 32 analysis is incomplete due to the withdrawal of the Hauraki iwi area. • Inadequate social modelling conducted • Outcomes from PC1 will highly alter the productivity from my landholding through unsustainable and unjustified compliance and mitigation costs significantly outweighing the annual income derived from the land. • Nitrogen Reference Points will have a significant market devaluation effect also as the reference point will determine what the land can be used for. This will result in the underutilisation (due to the consenting costs of changing farming type, and uncertainty of outcome) of production land and will not achieve the purpose of the Resource Management Act 1991 (RMA) to meet the reasonably foreseeable needs of future generations. • Outcomes from PC1 overlook that soils of Class I, II, IIIe are scarce in New Zealand, and the versatile, volcanic soils and the temperate climate particularly around the Franklin area mean this is a food producing area of national significance. 	<p>Then conduct a section 32 analysis to investigate the revised impact PC1 could have on society and economy.</p> <p>Amend rules in PC1 to remove NRP to align with intention of Objective 2.</p> <p>Enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored Farm Environment Plan (FEP) to align with intention of Objective 2.</p> <p>Address contaminants on a sub-catchment basis, to enable targeting of the highest omitting sub-catchments to align with intention of Objective 2.</p> <p>Develop robust indicators to measure social, economic and cultural wellbeing.</p>
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			<ul style="list-style-type: none"> • Waikato Regional Council (WRC) have stated they currently have no known means of robustly measuring social, economic or cultural wellbeing. 	
4.3	<p>Objective 3</p> <p>Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit</p>	Support with amendments	<p>Support reducing the diffuse discharges in the short-term by 10%, of the overall long-term 80-year water quality targets.</p> <p>However, there is a lack of scientific data to support PC1 to achieve Objective 3. For example, PC1 incentives high emitters - to maintain flexibility on my farm, and therefore my land value, I will need to keep my NRP as high as possible. To me, this is the opposite effect of what PC1 should achieve to improve the health and wellbeing of the Waikato and Waipa rivers.</p> <p>Oppose the attribute targets set in Table 3.11-1.</p>	<p>Retain a 10% achievement of the long-term water quality targets set out in PC1 by 2026.</p> <p>Amend rules in PC1 to remove NRP.</p> <p>Adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.</p> <p>Enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.</p>
4.4	<p>Objective 4</p> <p>People and community resilience</p>	Support with amendments	<p>Support people and community resilience – it must be a cornerstone objective in PC1.</p> <p>However, PC1 does not meet the requirements of Objective 4. The proposed rules undermine community resilience in the rural communities of the Waikato and Waipa catchments and will adversely impact on social and economic wellbeing in both the short term and long term.</p>	<p>Retain the staged approach.</p> <p>Amend rules in PC1 to remove NRP and land use change restriction.</p> <p>Adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.</p> <p>Enable appropriate mitigation strategies to be</p>

			<p>The NRP, associated farm devaluation and loss of flexibility, coupled with substantial compliance and mitigation costs on my farm are unsustainable.</p> <p>No benefit is awarded to low emitters who may be forced off their land through unsustainable financial impacts imposed by PC1. This will, in turn, undermine the rural communities of the Waikato and Waipa catchments, as detailed in Objective 2.</p> <p>Oppose the attribute targets set in Table 3.11-1.</p>	<p>adopted in the context of water quality gains to be made through a tailored FEP.</p>
4.5	<p>Objective 5 Mana Tangata – protecting and restoring tangata whenua values</p>	Neutral	<p>Supporting New Zealand’s primary production is the key.</p>	<p>Revise PC1 to acknowledge primary production as a core value to reflect Mana Tangata.</p>
4.6	<p>Objective 6 Whangamarino Wetland</p>	Support	<p>The Whangamarino Wetland should be restored.</p>	<p>Retain as proposed</p>
	3.11.3 Policies			
4.7	<p>Policy 1 Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens</p>	Support with amendments	<p>Support managing water quality on a sub-catchment basis because it considers soil suitability and climate conditions.</p> <p>Support stock exclusion, however only where it is practical to do so and is relative to water</p>	<p>Retain managing diffuse discharges and water quality on a sub-catchment basis.</p> <p>Enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.</p>

			<p>quality benefit gains.</p> <p>Support enabling low-intensity land uses by avoiding compliance and mitigation costs.</p> <p>Support moderate to high levels of contaminant discharges to reduce their discharges by appropriate mitigation strategies through a tailored FEP.</p> <p>However, the rules in PC1 do not reflect Policy 1 and 9.</p> <p>Oppose mandatory fencing in areas where slopes are over 15° and propose an element of discretion for fencing through the FEP process. This requirement is unjustified, does not align with proposed amendments to the NPS-FM and is financially unsustainable.</p>	<p>Amend rules in PC1 to reflect Policy 1 and 9.</p> <p>Amend Policy 1 in PC1 to state:</p> <p>c. Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs.</u></p> <p><u>d. Requiring farming activities on slopes exceeding 15 degrees (where break feeding does not occur) to manage contaminant discharges to water bodies through mitigation actions that specifically target critical source areas.</u></p> <p>Require clarification on how the slope is measured given the ranges of topography experienced within each paddock and adjoining watercourses.</p>
<p>4.8</p>	<p>Policy 2 Tailored approach to reducing diffuse discharges from farming activities</p>	<p>Support with amendments</p>	<p>Support a tailored, risk-based FEP, allowing appropriate and tailored mitigations to reduce diffuse discharges.</p> <p>Support the reduction of diffuse discharges throughout all sub-catchments, however only where applicable i.e. if the sub-catchment is well below all attribute targets then maintenance would be appropriate.</p>	<p>Retain appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP as a method for reducing contaminant discharge.</p> <p>Amend PC1 to reflect Policy 1 in adopting a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.</p>

			<p>Oppose an NRP because there should not an uncertain, estimated number that governs land management based upon nitrogen only. It is not clear whether the NRP would be attached to the land or the enterprise. NRP will have a significant market effect as the reference point will determine what the land can be used for.</p> <p>My FEP will provide transparency and confidence to Waikato Regional Council, and the wider community, that my property is reducing, or maintaining where applicable, its diffuse discharges relative to all four contaminants.</p>	Amend rules in PC1 to remove NRP.
4.9	<p>Policy 3 Tailored approach to reducing diffuse discharges from commercial vegetable production systems.</p>	Support with amendments	<p>Support flexibility to undertake commercial vegetable production while reducing average contaminant discharges over time.</p> <p>We strongly oppose capping the area of cropping enterprises. Capping the area of a cropping enterprise is a blunt tool which prevents farmers from utilising the land resource for their social economic well-being, and restricts any opportunity for the industry to grow, innovate and thrive.</p> <p>This policy also overlooks that soils of Class I, II, IIIe are scarce in New Zealand, and the</p>	<p>Retain provisions allowing for flexibility to undertake commercial vegetable production while reducing average contaminant discharges over time.</p> <p>Amend rules in PC1 to remove NRP.</p> <p>Require clarification on how commercial vegetable production enterprises that implement best practice measures to reduce discharges will be enabled by PC 1</p>

			<p>versatile, volcanic soils and the temperate climate particularly around the Franklin area (including Tuakau, Onewhero and Te Kohanga) mean this is a food producing area of national significance.</p> <p>Oppose an NRP because there should not an uncertain, estimated number that governs land management based upon nitrogen only. It is not clear whether the NRP would be attached to the land or the enterprise. NRP will have a significant market effect as the reference point will determine what the land can be used for.</p> <p>Support a tailored FEP or Certified Industry Scheme allowing appropriate and tailored mitigations to reduce diffuse discharges.</p> <p>Support enabling commercial vegetable production enterprises that reduce all four contaminants.</p>	
4.10	<p>Policy 4 Enabling activities with lower discharges to continue or to be established while signalling further change may be</p>	Support	<p>Support enabling low-intensity land uses.</p> <p>However, I consider the uncertainty surrounding 'future mitigation actions' to be unacceptable. The level of capital expenditure required to meet the 10-year plan without assurance of future compliance for hill country</p>	<p>Retain provisions allowing for low-intensity land uses to continue and establish.</p> <p>Remove any signalling of future mitigation action requirements from Policy 4 in PC1</p>

	required in future		farmers is prohibitive and counterproductive. If best practice is being adopted, then future certainty should be provided.	
4.11	Policy 5 Staged approach	Support with amendments	<p>Support an 80-year staged approach to achieve the long-term water quality targets.</p> <p>However, Policy 5 does not support Objective 2, 4 and 5. Because it does not:</p> <ul style="list-style-type: none"> • Minimise social disruption • Allow for innovation and new practices to develop • Support prosperous communities <p>There is little scientific evidence that PC1 will reduce diffuse discharges to achieve the long-term water quality targets.</p>	<p>Retain the staged approach.</p> <p>Amend rules in PC1 to remove NRP.</p> <p>Adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.</p> <p>Enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.</p>
4.12	Policy 6 Restricting land use change	Oppose	<p>Oppose restricting land use change based on the type of land use, as it is a blunt tool.</p> <p>This appears to pre-empt the outcome of an application for resource consent and we question whether this statement is lawful.</p> <p>This Policy and related rule (3.11.5.7) will inhibit growth and innovation within the Waikato region, and nationally because I am unable to adapt to market demands/changes. Land use flexibility is key to running sustainable business operations. Therefore,</p>	<p>Amend PC1 to state high priority sub-catchments, in relation to water quality, have a Restricted Discretionary activity status. And low priority sub-catchments to have a Permitted activity status.</p> <p>Amend PC1 to adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment. Then enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.</p>

			<p>Policy 6 conflicts with Objective 2, 4, 5 and Policy 5.</p> <p>Where a sub-catchment is of high priority (in terms of water quality), land use change should be a restricted discretionary activity status. However, where a sub-catchment is of low priority, land use change should be a permitted activity.</p>	
4.13	Policy 7 Preparing for allocation in the future	Support with amendments	<p>Support as it takes into account land suitability regarding diffuse discharge reductions.</p> <p>However, PC1 is severely restricting growth and innovation on my farm and in my community in order to give more time to gain scientific data to appropriately implement this Policy in the future.</p> <p>WRC needs to work collaboratively with stakeholder groups to develop sub-catchment management approach and enable appropriate mitigation strategies through a tailored FEP.</p>	<p>Retain reducing diffuse discharges while considering land suitability.</p> <p>Enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.</p> <p>WRC to work collaboratively with stakeholder groups to develop sub-catchment management approach.</p>
4.14	Policy 8 Prioritised implementation	Support with amendments	Support prioritising sub-catchments and implementing at different stages.	Retain as proposed.
4.15	Policy 9 Sub-catchment (including edge of	Support with amendments	Support managing water quality at a sub-catchment level.	Retain managing water quality on a sub-catchment level.

	field) mitigation planning, co-ordination and funding		However, the rules in PC1 should give effect to this Policy and enable appropriate mitigation strategies through a tailored FEP.	Amend the rules in PC1 to reflect Policy 1 and 9. Enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.
4.16	Policy 10 Provide for point source discharges of regional significance	Support with amendments	Support considering the regional significance of infrastructure and industry because there are certain point source discharges that are vital to human health and wellbeing. However, point source discharges should be taken into consideration for achieving the short and long term water quality targets, through a sub-catchment approach.	Retain the consideration of the regional significance of point source discharges infrastructure and industry. Amend PC1 to be holistic and include all sources influencing the health and wellbeing of the Waikato River and its catchments, including Koi Carp, point sources, and hydro-dams. Recognise that soils of Class I, II, IIIe are scarce in New Zealand, and the versatile, volcanic soils and the temperate climate particularly around the Franklin area (including Tuakau, Onewhero and Te Kohanga) mean this is a food producing area of regional significance. Adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.
4.17	Policy 11 Application of Best Practicable Options and mitigation or offset of effects to	Support with amendments	Support applying Best Practicable Options. However, there is not applicable to all stakeholders, and there are no specific rules to reflect this Policy in PC1.	Retain applying Best Practicable Options but amend to include all stakeholders e.g. through FEP. Provide clarification on what is a “significant toxic

	point source discharges			adverse effect". Amend rules to reflect Policy 11.
4.18	Policy 12 Additional considerations for point source discharges in relation to water quality targets.	Support with amendments	Support considering past technology upgrades and costs associated with upgrading. However, this consideration is not consistent with land owners. Point source discharges can stage future mitigations to spread innovation costs over time to allow for a return on investment. This is not the case for me as a land owner. There is also no regard to cumulative effects from point source discharges.	Retain considering past technology upgrades and costs associated with upgrading. Adopt a sub-catchment management approach to ensure collaborative and fair management of resources within the region. Amend PC1 to allow these considerations to occur across all sources influencing the health and wellbeing of the Waikato and Waipa rivers. This could be achieved by enabling appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.
4.19	Policy 13 Point sources consent duration	Support with amendments	Support considering the magnitude and significance of the investment made. However, land owners should be provided with the same consideration when applying for consent under rule 3.11.5.4, 3.11.5.5, 3.11.5.6 and 3.11.5.7 in PC1.	Retain consideration of the consent duration in relation to the magnitude and significance of the investment made. Adopt to include all property owners and enterprises within the Waikato and Waipa Catchments.
4.20	Policy 14 Lakes Freshwater Management Units	Support	Support restoring and protecting lakes in 80 years through tailored plans.	Retain as proposed.
4.21	Policy 15	Support with	Support restoring the Whangamarino	Retain restoring the Whangamarino Wetland.

	Whangamarino Wetland	amendments	<p>Wetland.</p> <p>However, I believe that all sources influencing the water quality of the wetland should be considered and remediated in collaboration, not just one source.</p>	Amend Policy 15 to be holistic and include all sources influencing the health and wellbeing of the Waikato River and its catchments especially pest fish species, in relation to sub-catchment management.
4.22	Policy 16 Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	Support with amendments	<p>Support flexibility for development of Māori land. However, there is no rule in PC1 to reflect this Policy (16).</p> <p>Additionally, under PC1 all property owners and enterprises have restricted flexibility. This, in turn, reduces the social, economic and cultural benefits for everybody because the surrounding rural communities are compromised.</p>	<p>Retain flexibility for development of Māori land.</p> <p>Amend PC1 to include a rule to reflect Policy 16.</p> <p>Consider a similar flexibility for all property owners and enterprises.</p>
4.23	Policy 17 Considering the wider context of the Vision and Strategy	Support with amendments	<p>Support applying policies and methods based on the Vision and Strategy.</p> <p>Only one objective has been considered for PC1: <i>Objective k. The restoration of water quality within the Waikato River so that it is safe for people to swim in and take food from over its entire length.</i></p> <p>There are currently thirteen objectives, however, the WRA's Vision and Strategy is currently under review. Therefore PC1 may</p>	<p>Retain applying policies and methods based on the Vision and Strategy.</p> <p>Withdraw PC1 until the Hauraki Iwi area and the WRA's Vision and Strategy has been amended.</p>

			end up inadequately reflecting the Vision and Strategy.	
	3.11.4 Implementation Methods			
4.24	3.11.4.1 Working with others	Support	Support working with stakeholders to ensure PC1 is implemented effectively.	Retain as proposed.
4.25	3.11.4.2 Certified Industry Scheme	Support	Support that I can opt into a Certified Industry Scheme to help me manage my operation to the highest environmental standard while considering my social, cultural, and economic impacts.	Retain as proposed.
4.26	3.11.4.3 Farm Environment Plans	Support with amendments	Support a tailored, risk-based FEP for my business to improve, or maintain where applicable, my environmental standard in the desired time-frame negotiated between my Farm Environmental Planner and myself. However, I understand there could be a shortage of Certified Farm Environment Planners. As an alternative, I suggest that land users who have adequate experience and capabilities should be able to work with an approved industry or scheme, run by WRC, to be accredited to develop their own FEP based upon a common template.	Retain a tailored, risk-based FEP. Enable land users who have adequate experience and capabilities should be able to work with an approved industry or scheme, run by WRC, to be accredited to develop their own FEP based upon a common template.
4.27	3.11.4.4 Lakes and Whangamarino Wetland	Support with amendments	Support WRC working with others to gain knowledge and information around lakes and the Whangamarino wetland. Support 3.11.4.4 (d) “work towards managing	Retain working with others in relation to lakes and Whangamarino Wetland. Retain managing pest weeds and fish.

			<p>the presence of pest weeds and fish in the shallow lakes and connected lowland rivers area, including Whangamarino Wetland”.</p> <p>However, there are no policies, objectives or rules in PC1 that recognise this point. It should also be extended to the Waikato and Waipa rivers and their catchments, not just shallow lakes and connected lowland rivers area.</p>	Amend PC1 to include the management of pest weeds and fish in the policies, objectives and rules in the Waikato and Waipa Catchments.
4.28	3.11.4.5 Sub-catchment scale planning	Support with amendments	<p>Fully support managing diffuse discharges and water quality on a sub-catchment level.</p> <p>However, this method is not reflected in the rules of PC1.</p>	<p>Retain managing diffuse discharges and water quality on a sub-catchment level.</p> <p>Amend PC1 to reflect this method in the rules.</p>
4.29	3.11.4.6 Funding and implementation	Support	<p>Support WRC providing resources and leadership to implement PC1.</p> <p>Support securing funding for implementation of PC1.</p>	Retain as proposed.
4.30	3.11.4.7/8 Information needs to support any future allocation/Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	Support with amendments	<p>Support gaining data.</p> <p>Support allocation on a sub-catchment basis.</p> <p>Oppose future allocation.</p>	<p>Retain gaining data.</p> <p>Amend PC1 to enable the management of diffuse discharges on a sub-catchment basis.</p>
4.31	3.11.4.9	Support	Support managing the effects of urban	Retain as proposed

	Managing the effects of urban development		development.	
4.32	3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	Support	Support implementing best practice guideline to reduce diffuse discharges.	Retain as proposed.
	3.11.5 Rules			
4.33	3.11.5.1 Permitted Activity Rule – Small and Low-Intensity farming activities	Support	Support enabling low-intensity land uses to continue and establish under a Permitted Activity status. Stock exclusion should be in conformance with the proposed amendments to the NPS-FM. Additionally, clarification is required to determine what constitutes slope on land where the topography is undulating, and portions of the slope are both under and over the 15° threshold. This is currently subject to interpretation and difficult to implement.	Retain enabling low-intensity land uses to continue and establish under a Permitted Activity status. Amend PC1 for stock exclusion: Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs.</u> Provide clarification on how/where to measure slope on undulating land.
4.34	3.11.5.2 Permitted Activity Rule – Other farming activities	Support with amendments	Support low-intensity land uses that have little to no environmental risk to be under a Permitted Activity status. Support stock exclusion, however only where it is practical to do so and is relative to water quality benefit gains.	Retain Permitted Activity status for low-intensity land uses. Amend PC1 for stock exclusion: Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C <u>for areas with a slope less than 15 degrees and on</u>

			<p>Oppose a NRP because there should not be a modelled number that controls my ability to manage my land. My FEP will provide a risk-based mitigation plan to reduce all my diffuse discharges. Additionally, I do not use OVERSEER and have no way of knowing what Nitrogen losses occurred from the farm 2 years ago, let alone what it was in 2014/15 within 10, 20, 50 years' time. OVERSEER was never designed as a regulatory tool; only as a management tool.</p> <p>Opposed 3.11.5.2-3b(i), I should not be limited to my stocking rate on my land at 22 October 2016. This is not a true representation of my farming activity and it severely limits my growth and innovation. It also hinders my economic viability for my business and for my community. Overall this undermines Objective 2, 4, 5 and Policy 5.</p> <p>Oppose 3.11.5.4 c, "or grazed" should not be included. Again, it severely limits my growth and innovation. It also hinders my economic viability for my business and for my community. Overall this undermines Objective 2, 4, 5 and Policy 5.</p>	<p><u>those slopes exceeding 15 degrees where break feeding occurs.</u></p> <p>Amend rules in PC1 to remove NRP.</p> <p>Address contaminants on a sub-catchment basis, to enable targeting of the highest omitting sub-catchments.</p> <p>Enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored Farm Environment Plan.</p> <p>Amend 3.11.5.2 introduction to: The use of land for farming activities (excluding commercial vegetable production) and the associated diffuse discharge of nitrogen, phosphorous, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water where the property area is greater than 4.1 hectares and has more than 6 stock units per hectare <u>but less than 18 stock units per hectare</u>, or is used for arable cropping, is a permitted activity subject to the following conditions:</p> <p>Amend rule in PC1 to remove 3.11.2-3b(i).</p>
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			Require clarification around stock exclusion. 3.11.5.2-3e and 3.11.5.2-4e(ii) states a three-metre buffer between the water body and stock is required. However, in Schedule C the buffer is one metre, and in Schedule 1 the buffer is based on slope.	Provide clarification around stock exclusion requirements i.e. setback buffers and where to measure setback from on undulating land.
4.35	3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	Support with amendments	<p>Support a tailored, risk-based Farm Environment Plan to reduce diffuse discharges.</p> <p>Support a Certified Industry Scheme</p> <p>Support stock exclusion, however only where it is practical to do so and is relative to water quality benefit gains.</p> <p>Oppose a NRP because there should not a modelled number that controls my ability to manage my land. My FEP will provide a risk-based mitigation plan to reduce all my diffuse discharges. Additionally, I do not use OVERSEER and have no way of knowing what Nitrogen losses occurred from the farm 2 years ago, let alone what it was in 2014/15 within 10, 20, 50 years’ time. OVERSEER was never designed as a regulatory tool; only as a management tool.</p> <p>Require clarification around stock exclusion. 3.11.5.3 refers to Schedule C and Schedule 1,</p>	<p>Retain FEP, Certified Industry Scheme, and stock exclusion where practical.</p> <p>Amend rule in PC1 to remove NRP.</p> <p>Amend rule in PC1 to: Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C <u>for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs.</u></p> <p>Address contaminants on a sub-catchment basis, to enable targeting of the highest omitting sub-catchments.</p> <p>Provide clarification around stock exclusion requirements i.e. setback buffers and where to measure setback from on undulating land.</p> <p>Provide clarification on how long a FEP will be viable for.</p>

			both have stock exclusion requirements. Schedule C states the buffer is one metre, and Schedule 1 the buffer is based on slope.	Provide clarification around stock exclusion requirements i.e. setback buffers and where to measure setback from on undulating land.
4.36	3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	Support with amendments	<p>Support a tailored, risk-based FEP to reduce diffuse discharges.</p> <p>Support stock exclusion, however only where it is practical to do so and is relative to water quality benefit gains.</p> <p>Require clarification around applying for consent to produce food, and other primary products, on my land. I have concerns about the costs and the background/knowledge level of the planner approving my consent. I am in priority sub-catchment 2, therefore, I am a Permitted Activity until 1 January 2023 in relation to above sub-catchment number. Assuming consents will not go past the proposed start date of 2026 for Plan Change 2, my consent will be for 3 years in relation to above. The only positive of applying for consent is the security and certainty that I can farm my land, as stated in my consent, for the next so many years. This duration needs to be for an appropriate length of time i.e. at least 10 years.</p>	<p>Retain FEP, Certified Industry Scheme, and stock exclusion where practical.</p> <p>Amend rule in PC1 to remove NRP.</p> <p>Address contaminants on a sub-catchment basis, to enable targeting of the highest omitting sub-catchments.</p> <p>Recommend 15 years or more for consent duration.</p> <p>Provide clarification around stock exclusion requirements i.e. setback buffers and where to measure setback from on undulating land.</p> <p>Provide clarification on how long a FEP will be viable for.</p>

			<p>Oppose a NRP because there should not a modelled number that controls my ability to manage my land. Additionally, I do not use OVERSEER and have no way of knowing what Nitrogen losses occurred from the farm 2 years ago, let alone what it was in 2014/15 within 10, 20, 50 years' time. OVERSEER was never designed as a regulatory tool; only as a management tool.</p> <p>My FEP will provide a risk-based mitigation plan to reduce all my diffuse discharges.</p> <p>Require clarification around stock exclusion. 3.11.5.3 refers to Schedule C and Schedule 1, both have stock exclusion requirements. Schedule C states the buffer is one metre, and Schedule 1 the buffer is based on slope.</p>	
4.37	3.11.5.7 Non-Complying Activity Rule – Land Use Change	Oppose	<p>In the future, we plan for one of us to leave our full-time job and start a new enterprise on the land. This rule means it will be difficult to get approval from the Regional Council and we need to be certain that we will be able to provide for our economic well-being.</p> <p>Oppose non-complying activity status because:</p> <ul style="list-style-type: none"> • Unaffordable to land owners wanting to increase their land area, rather than intensify 	<p>Address contaminants on a sub-catchment basis, to enable targeting of the highest omitting sub-catchments.</p> <p>Reduce activity status to Restricted Discretionary for high priority sub-catchments, in relation to water quality, and limit discretion to the management of the diffuse discharges of the four contaminants.</p> <p>Reduce activity status to Permitted for low</p>

			<ul style="list-style-type: none"> • Will result in less food for a growing population. Eventually, end up costing the consumer due to limited food availability. • Limits flexibility, therefore growth innovation, and reduces land value • Jeopardises my business, family and community success and growth • Transfers wealth based on high emissions and/or high NRP i.e. a dairy farm with a high NRP will have a higher land value compared to a dairy farm with a low NRP • Removes, to a degree, property rights • Adds stress to my life, my family's life, and my community's life • Will limit the amount of supplement feed grown on the farm, meaning the purchase of feed from suppliers which will be more expensive. • Overall will largely affect the local, regional and national economy. <p>This duration of resource consent needs to an appropriate length of time i.e. at least 10 years.</p> <p>Overall this rule undermines Objective 2, 4, 5 and Policy 1, 2, 5 and 9.</p>	<p>priority sub-catchments, in relation to water quality.</p> <p>Enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.</p>
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Schedules				
4.38	Schedule B Nitrogen Reference Point	Oppose	Oppose a NRP because there should not a modelled number that controls my ability to manage my land. Additionally, I do not use OVERSEER and have no way of knowing what Nitrogen losses occurred from the farm 2 years ago, let alone what it was in 2014/15 within 10, 20, 50 years' time. OVERSEER was never designed as a regulatory tool; only as a management tool.	Amend PC1 to remove NRP.
4.39	Schedule C Stock Exclusion	Support with amendments	Require clarification around stock exclusion. Schedule C and Schedule 1, both have stock exclusion requirements. Schedule C states the buffer is one metre, and Schedule 1 the buffer is based on slope. Require clarification around the term "livestock" that must not be permitted to enter onto or pass across the bed of the water body.	Provide clarification around stock exclusion requirements i.e. setback buffers and where to measure setback from on undulating land. Provide clarification that "cattle, horses, deer and pigs" must use a livestock crossing structure or alternatively provide a definition of "livestock".
4.40	Schedule 1 Requirements for Farm Environment Plans	Support with amendments	It is not clear whether the NRP would be attached to the land or the enterprise. NRP will have a significant market effect as the reference point will determine what the land can be used for. Oppose a NRP because there should not a	Amend PC1 to remove NRP.

			<p>modelled number that controls my ability to manage my land. Additionally, I do not use OVERSEER and have no way of knowing what Nitrogen losses occurred from the farm 2 years ago, let alone what it was in 2014/15 within 10, 20, 50 years' time.</p> <p>OVERSEER was never designed as a regulatory tool; only as a management tool.</p>	
3.11.6 List of Tables and Maps				
4.41	Table 3.11-1	Oppose	Oppose the attribute targets set in Table 3.11-1. The attribute targets are too prescriptive and should align with the National Policy Statement for Freshwater Management (NPS-FM) and Waikato River Authority's (WRA) Vision and Strategy.	Amend the attribute targets to align with the National Policy Statement for Freshwater Management (NPS-FM).
Glossary of Terms				
4.42	Definition – Nitrogen Reference Point	Oppose	OVERSEER was never designed as a regulatory tool; only as a management tool.	Amend PC1 to remove NRP.