

**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
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Complete the following

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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.



Signature **6.3.2017**
date

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

<p>The specific provisions my submission relates to are:</p> <p>State specifically what Objective, Policy, Rule, map, glossary, or issue you are referring to.</p>	<p>My submission is that:</p> <p>State:</p> <ul style="list-style-type: none"> • whether you support, or oppose each provision listed in column 1; • brief reasons for your views. 	<p>The decision I would like the Waikato Regional Council to make is:</p> <p>Give:</p> <ul style="list-style-type: none"> • 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
<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>

**The specific provisions of proposed Plan Change 1 that my submissions relates to:
Long term restoration and protection of water quality for each sub-catchment and
Freshwater Management Unit Objective 1, and table 3-11-1**

**3.11.2 Objective 1. Long term restoration and protection of water quality for each sub-catchment, and Table 3.11-1
80 year water quality limits/targets and any consequential amendments arising from this submission point.**

I support or oppose the above provision/s:

Oppose

My submission is that:

1. This objective, and its numerical representation in table 3.11-1 80 year water quality limits/targets although commendable does not recognise the reality that things have changed in 150 years and in some cases such as E.coli and sediment are no longer achievable even under the most pristine conditions.
ie We have pest animals in our forests and carp in our waterways.
We have hydro-electric dams on our rivers.
Our native forests have been replaced with introduced pine trees.
Our cities with industry and large populations create polluting runoff.
2. If we put too much into full restoration of the river, rather than objectives 2 and 4 in relation to protecting and providing for social and economic values which significantly contribute to the health and well-being of people and communities, then sustainable management will not be achieved. Full achievement of Objective 1 and table 3.11-1 80 year targets means that objective relating to social, cultural and economic wellbeing will be undermined.

The decision I would like the Waikato Regional Council to make is:

1. Withdraw the plan and replace it with objectives included numerical water quality limits/targets which consider the reality of the Waikato, which are achievable, provide for the protection of its life supporting capacity, while also ensuring that the health and wellbeing, including social and economic values, of people and communities are safeguarded.

**The Specific provisions of proposed Plan Change 1 that my submission relates to:
Conversion from farming to forestry. Rule 3.11.5.3 – 3.11.5.5**

I support or oppose the above provision/s:

Oppose

My submission is that:

1. We support Healthy Rivers objectives in principal and agree with the plan to improve water quality.
2. However we oppose the conversion of farmland to forestry to achieve this goal as we believe the scientific evidence is not available.

The decision I would like the Waikato Regional Council to make is:

1. The Council to withdraw the plan for wholesale forestry.

**The specific provisions of proposed Plan Change 1 that my submission relates to:
Stock Exclusion**

Stock Exclusion. Schedule C Rule 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.4, 3.11.5.6, definitions, and any consequential amendments arising from these submission points.

I support or oppose the above provision/s

Oppose

My submission is that:

1. We support the fencing of waterways.
2. However we oppose the exclusion of stock from land with a slope of >25 degrees. This rule would make our farming business unviable because it would restrict the grazing of a large percentage of the farm and the cost of fencing off these areas would be prohibitive.
3. This requirement to exclude cattle through permanent fencing is very broad and will create perverse environmental and financial outcomes over hill country which by its nature is not intensively farmed.
4. Fencing on hill country is expensive and often limited to ridges – natural fence lines.
5. This rule would seriously devalue our farm by making it an uneconomical unit.
6. Definition of the 25 degree slope threshold/standards in Rule 3.11.5.4 which are required to be fenced up to, is not clear with no implementation plan available.
7. Definition of waterbodies under Schedule C in relation to clauses I,ii,iii and iv are still unclear and require further elaboration in order for farmers to be able to determine what waterbodies on their properties the rules relate to.

The decision I would like the Waikato Regional Council to make is:

1. 25 degree slope provision in rule 3.11.5.4 be removed.
2. Farm environment plans to focus on addressing actual risk, targeting critical source areas.

**The specific provisions of proposed Plan Change 1 that my submission relates to:
Withdrawal of the lower part of the Waikato Catchment from PC1 (Hauraki Iwi)**

Partial withdrawal of proposed Waikato Regional Plan Change 1.

I support or oppose the above provision/s:

Oppose

My Submission is that:

The Waikato Regional Council needs to treat all its constituents affected by Plan Change 1 as one entity. Withdrawal of part creates more uncertainty for those involved than it removes.

The decision I would like the Waikato Regional Council to make is:

The whole plan should be withdrawn until The Waikato Regional Council can treat the whole of its catchment as one.

**The specific provision of proposed Plan Change 1 that my submission relates to:
Land Use Change provisions and Restrictions**

Restricting Land use Change Rules 3.11.5.6 and 3.11.5.7 and any consequential amendments arising from this submission.

I support or oppose the above provision/s:

Oppose

My Submission is that:

1. Our farming activity requires us to have a very flexible farm management programme. We need the ability to change farming practice from year to year according to markets and weather conditions. Ie from grazing and trading, to maize growing and cereal cropping, to wintering dairy cows and the supply of hay and silage.
2. We would like the right to change the land use in the future if the present land use become uneconomical.
3. The ability of farmers to innovate has always been at the forefront of economic growth of New Zealand.
4. Future opportunities to take advantage of yet to be developed technologies could be compromised.
5. Land use provisions have no size exceptions, and as such the regulatory requirements and how they are to be applied is uncertain.

The decision I would like the Waikato Regional Council to make is:

1. Council must allow for flexibility with this policy, rather than blanket rules based on existing land uses.
2. Exceptions to Land Use change restrictions should be provided, including for smaller land areas (below 40 hectares) and where environmental effects are minimal.
3. Restrictions and an assessment of the effects should not be limited to consideration of nitrogen discharges as modelled by OVERSEER.
4. Nitrogen reference point (grandparenting) to be calculated over a longer period.
5. Application of rules needs to be low cost and with limited bureaucracy.

The specific provisions of proposed Plan Change 1 that my submission relates to:

Nitrogen Reference Point (grandparenting existing users to a historic nitrogen leaching number)

Nitrogen management Adopts a Nitrogen Reference Point (NRP) approach and holds existing land users to this number (Grandparenting of Nitrogen leaching) Rule 3.11.5.3, 3.11.5.4 – 3.11.5.7, Schedule B, and definition of a stock unit, and any consequential amendments arising from this submission point.

I support or oppose the above provision/s:

Oppose

My submission is that:

1. Nitrogen reference point should not be calculated over the years 2014/15 and 2015/16 but support that all farms should stay within a rolling 5 year average.
2. Accuracy of OVERSEER for drystock and particularly trading properties is apparently very poor (50% variation)
3. Strategic fertilising of our farm is an integral part of keeping the business viable.
4. Application of the NRP reference will produce significant inequalities between neighbours leading to ill-will in communities.
5. If a property's NRP is lower because of previous conservative management then opportunities for innovation will be severely restricted.

The decision I would like the Waikato Regional Council to make is:

1. Change the years 2014/15 and 2015/16 or NRP to a 5 year rolling average.
2. Ensure OVERSEER is a more dependable reference.

**The Specific provisions of proposed Plan Change 1 that my submission relates to:
Farm Environment Plans**

Schedule 1. Rule 3.11.5.3, 3.11.5.4, 3.11.5.6 and any consequential amendments arising from this submission point.

I support or oppose the above provision/s:

Support with amendments

My submission is:

1. Oppose the cultivation and grazing restrictions set out in the proposed Plan Change 1 requirements.
2. Uncertainty in how the rules including requirements of FEP will be implemented as the plan governing this has not been released, and large areas of uncertainty exist in how the rules and schedules are to be defined.
3. There appears to be no low cost appeal process available, if staff interpretation of rules, and therefore acceptance of an environment plan is debatable. This leaves open possible inconsistency across the region.

The decision I would like the Waikato Regional Council to make is:

1. Environmental plans need to be written to allow flexibility such as with Nitrogen discharges and application of management practices such as appropriate good management practices at a point in time. FEPs should be tailored to the individual property and focus and critical source management rather than applying blanket regulatory standards.
2. An independent panel needs to be available to allow contested points between staff and farmers. Environmental plans should be able to be settled without the expensive need to appeal to the Environment Court.

The Specific provision of proposed Plan Change 1 that my submission relates to:

Reducing Contaminate Losses from Farms.

Schedule 1. Rule 3.11.5.3 – 3.11.5.7 and any consequential amendments arising from this submission point.

I support or oppose the above provision/s:

Oppose

My submission is that:

1. This rule severely affects our ability to continue farming in a viable manner as it requires the reduction of stock numbers and fertiliser quantity.

The decision I would like the Waikato Regional Council to make is:

1. Make the NRP far more flexible to cover variations in weather conditions and seasonal challenges.
2. Allow the use of modified grass varieties and stock feeds that are proven to lower emissions and nitrogen levels.

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Yours sincerely

Mark Camp



6.3.2017

Signature

Date

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