

Submission: Waikato Regional Council's Proposed Healthy Rivers/Wai Ora Plan Change 1 (PPC1)

Submission on a publicly notified proposed Regional Plan prepared under the Resource Management Act 1991.

Submitting On: The Waikato Regional Council's Proposed Healthy Rivers/Wai Ora Plan Change 1 (PC1)

Submitting To: Waikato Regional Council
401 Grey Street
Hamilton East
Private bag 3038
Waikato Mail Center
HAMILTON 3240

Date:	4-3-17
Full Name:	Mathew John Denize
Phone (home):	078847611
Phone (mobile/work):	0272933233
Postal Address:	771 Rotokohu rd RD3 Paeroa 3673
Email Address:	matdenize@yahoo.com

Submission

1. I have reviewed Waikato Regional Council's Proposed Healthy Rivers/Wai Ora Plan Change 1 (PPC1) and oppose the Plan Change in its current form.

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.

 5-3-17
Signature date

Signature date

2. Thank you for the opportunity to submit on the Waikato Regional Council's Proposed Plan Change 1 (PPC1).
3. The table below are the details for the specific provisions of the proposal that this submission relates to and the decisions it seeks from Council. 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.

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	Support with amendments	Support maintaining the long term social, economic and cultural wellbeing; this must be a foundation objective in PC1.	Retain the maintenance of long-term social, economic and cultural wellbeing in the Waikato and Waipa catchment communities.

	term		<p>However, PC1 is not achieving Objective 2 because:</p> <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 • Compliance costs alone are likely to cost my business • Outcomes from PC1 will highly alter my business and community because they will be undermined through unsustainable and unjustified compliance and mitigation costs, farm devaluation and Nitrogen Reference Point (NRP). • Waikato Regional Council (WRC) have stated they currently have no known means of robustly measuring social, economic or cultural wellbeing. 	<p>Withdraw PC1 until the Hauraki Iwi area and the WRA's Vision and Strategy has been amended. 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>
4.3	Objective 3 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	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.</p> <p>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>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	Objective 4 People and	Support with amendments	Support people and community resilience – it must be a cornerstone objective in PC1.	Retain the staged approach.

	community resilience		<p>However, currently 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. The NRP, associated farm devaluation and loss of flexibility, coupled with substantial compliance and mitigation costs on many farms is unsustainable, as evidenced by case studies.</p> <p>Water quality already meets attribute targets in the majority of these sub-catchments. Despite this, 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>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 adopted in the context of water quality gains to be made, through a tailored FEP.</p>
	3.11.3 Policy			
4.7	Policy 1 Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	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 quality benefit gains.</p> <p>Support enabling low intensity land uses.</p> <p>Support moderate to high levels of contaminant discharges to reduce their</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>Amend rules in PC1 to reflect Policy 1 and 9.</p> <p>Amend Policy 1 in PC1 to state (changes are red):</p> <p>c. Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands</p>

			<p>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°. This requirement is unjustified, does not align with proposed amendments to the NPS-FM, and is financially unsustainable for the majority. It is considered that the increased erosion risk and sediment loading in waterbodies from constructing fences over 15°.</p>	<p>and lakes for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs.</p> <p>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.</p> <p>Require clarification on how slope is measured given the ranges of topography experienced within each paddock and adjoining watercourses.</p>
4.8	<p>Policy 2 Tailored approach to reducing diffuse discharges from farming activities</p>	Support with amendments	<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>Oppose a NRP because there should not an uncertain, estimated number that governs land management based upon nitrogen only. 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>	<p>Retain appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.</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>
4.9	<p>Policy 4 Enabling activities with lower discharges</p>	Support	<p>Support enabling low intensity land uses.</p> <p>However, I consider the uncertainty</p>	Retain provisions allowing for low intensity land uses to continue and establish.

	to continue or to be established while signalling further change may be required in future		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 farmers is prohibitive and counterproductive. If best practice is being adopted, then future certainty should be provided.	Remove any signalling of future mitigation action requirements from Policy 4 in PC1
4.10	Policy 5 Stage 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>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>
4.11	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. 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, 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</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>

			status. However, where a sub-catchment is of low priority, land use change should be a permitted activity.	
4.12	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>
4.13	Policy 8 Prioritised implementation	Support	Support prioritising sub-catchments and implementing at different stages.	Retain as proposed.
4.14	Policy 9 Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	Support with amendments	<p>Support managing water quality at a sub-catchment level.</p> <p>However, the rules in PC1 should give effect to this Policy and enable appropriate mitigation strategies through a tailored FEP.</p>	<p>Retain managing water quality on a sub-catchment level.</p> <p>Amend the rules in PC1 to reflect Policy 1 and 9.</p> <p>Enable appropriate mitigation strategies to be adopted in the context of water quality gains to be made, through a tailored FEP.</p>
4.15	Policy 10 Provide for point source discharges of regional significance	Support with amendments	<p>Support considering the regional significance of infrastructure and industry because there are certain point source discharges that are vital to human health and wellbeing.</p> <p>However, point source discharges should be</p>	<p>Retain the consideration of regional significance of point source discharges infrastructure and industry.</p> <p>Amend PC1 to be holistic and include all sources influencing the health and wellbeing of the</p>

			<p>taken into consideration for achieving the short and long term water quality targets, through a sub-catchment approach.</p>	<p>Waikato River and its catchments, including Koi Carp, point sources, and hydro-dams.</p> <p>Adopt a sub-catchment management approach to ensure collaborative and fair management of resources within each sub-catchment.</p>
4.16	<p>Policy 11 Application of Best Practicable Options and mitigation or offset of effects to point source discharges</p>	Support with amendments	<p>Support applying Best Practicable Options.</p> <p>However, there is not applicable to all stakeholders, and there are no specific rules to reflect this Policy in PC1.</p>	<p>Retain applying Best Practicable Options but amend to include all stakeholders e.g. through FEP.</p> <p>Provide clarification for what is a "significant toxic adverse effect".</p> <p>Amend rules to reflect Policy 11.</p>
4.17	<p>Policy 12 Additional considerations for point source discharges in relation to water quality targets.</p>	Support with amendments	<p>Support considering past technology upgrades and costs associated with upgrading.</p> <p>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 in investment. This is not the case for me as a land owner. There is also no regard to cumulative effects from point source discharges.</p>	<p>Retain considering past technology upgrades and costs associated with upgrading.</p> <p>Adopt a sub-catchment management approach to ensure collaborative and fair management of resources within the region.</p> <p>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.</p>
4.18	<p>Policy 13 Point sources consent duration</p>	Support with amendments	<p>Support considering the magnitude and significance of the investment made.</p> <p>However, land owners should be provided the same consideration when applying for consent under rule 3.11.5.4, 3.11.5.5, 3.11.5.6 and</p>	<p>Retain consideration of the consent duration in relation to the magnitude and significance of the investment made.</p> <p>Adopt to include all property owners and enterprises within the Waikato and Waipa</p>

			3.11.5.7 in PC1.	Catchments.
4.22	Policy 17 Considering the wider context of the Vision and Strategy	Support with amendments	Support applying policies and methods based on the Vision and Strategy. However, the WRA's Vision and Strategy is currently under review, therefore PC1 may end up inadequately reflecting the Vision and Strategy.	Retain applying policies and methods based on the Vision and Strategy. Withdraw PC1 until the Hauraki Iwi area and the WRA's Vision and Strategy has been amended.
3.11.4 Implementation Methods				
4.23	3.11.4.1 Working with others	Support	Support working with stakeholders to ensure PC1 is implemented effectively.	Retain as proposed.
4.24	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.
4.25	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 a 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.
4.26	3.11.4.4 Lakes and	Support with amendments	Support WRC working with others to gain knowledge and information around lakes and	Retain working with others in relation to lakes and Whangamarino Wetland.

	Whangamarino Wetland		<p>the Whangamarino wetland.</p> <p>Support 3.11.4.4 (d) “work towards managing 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>	<p>Retain managing pest weeds and fish.</p> <p>Amend PC1 to include the management of pest weeds and fish in the policies, objectives and rules in the Waikato and Waipa Catchments.</p>
4.27	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>
4.28	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.
4.29	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>
4.30	3.11.4.9 Managing the effects of urban development	Support	Support managing the effects of urban development.	Retain as proposed
4.31	3.11.4.12	Support	Support implementing best practice guideline	Retain as proposed.

	Support research and dissemination of best practice guidelines to reduce diffuse discharges		to reduce diffuse discharges.	
3.11.5 Rules				
4.32	3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	Support	<p>Support enabling low intensity land uses to continue and establish under a Permitted Activity status.</p> <p>Stock exclusion should be in conformance with the proposed amendments to the NPS-FM.</p> <p>Additionally, clarification is required to determine what constitutes slope on land where 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.</p>	<p>Retain enabling low intensity land uses to continue and establish under a Permitted Activity status.</p> <p>Amend PC1 for stock exclusion: Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs.</p> <p>Provide clarification on how/where to measure slope on undulating land.</p>
4.33	3.11.5.2 Permitted Activity Rule – Other farming activities	Support with amendments	<p>Support low intensity land uses that have little to no environmental risk to be under a Permitted Activity status.</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 number that controls my ability to manage my land in the way I see fit. My FEP will provide a risk based mitigation plan to reduce all my diffuse discharges. Additionally, the 2014/2015 and 2015/2016 financial years occur when the</p>	<p>Retain Permitted Activity status for low intensity land uses.</p> <p>Amend PC1 for stock exclusion: Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs.</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-</p>

		<p>payout was low, therefore my on-farm inputs were lower. This is not a true representation of the past use of land.</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. In turn, this will generate an additional load of stress on myself and my community. Overall this undermines Objective 2, 4, 5 and Policy 5.</p> <p>By adding a maximum of 18 stock units per hectare, at 30 June 2016 would indicate the optimal winter carrying capacity of the land, aligning with good management practices.</p> <p>Oppose 3.11.5.4 c, "or grazed" should not be included and cultivation should be allowed up to 25°. Again, it severely limits my growth and innovation. It also hinders my economic viability for my business and for my community. In turn, this will generate an additional load of stress on myself and my community. Overall this undermines Objective 2, 4, 5 and Policy 5.</p> <p>Require clarification around stock exclusion. 3.11.5.2-3e and 3.11.5.2-4e(ii) states a three-metre buffer between water body and stock is required. However, in Schedule C the buffer is one-meter, and in Schedule 1 the buffer is based on slope.</p>	<p>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 but less than 18 stock units per hectare at the 30 June 2016, 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> <p>Amend rule in PC1 to: No part of the property or enterprise over 45 25° slope is cultivated or grazed unless effects of diffuse discharges can be mitigated</p> <p>Provide clarification around stock exclusion requirements i.e. setback buffers and where to measure setback from on undulating land.</p>
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4.34	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 number that controls my ability to manage my land in the way I see fit. My FEP will provide a risk based mitigation plan to reduce all my diffuse discharges. Additionally, the 2014/2015 and 2015/2016 financial years occur when the payout was low, therefore my on-farm inputs were lower. This is not a true representation of the past use of land.</p> <p>Also, Overseer is the only available tool for me to generate my NRP, but it was never designed as a regulatory tool; only as a great management tool.</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-meter, and Schedule 1 the buffer is based on slope.</p>	<p>Retain FEP, Certified Industry Scheme, and stock exclusion where practical.</p> <p>Amend rule in PC1 to: Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C for areas with a slope less than 15 degrees and on those slopes exceeding 15 degrees where break feeding occurs.</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 around how long a FEP will be viable for.</p> <p>Provide clarification around stock exclusion requirements i.e. setback buffers and where to measure setback from on undulating land.</p>
4.35	3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified		<p>Support a tailored, risk based Farm Environment Plan to reduce diffuse discharges.</p> <p>Support stock exclusion, however only where it is practical to do so, and is relative to water</p>	<p>Retain FEP, Certified Industry Scheme, and stock exclusion where practical.</p> <p>Address contaminants on a sub-catchment basis, to enable targeting of the highest omitting sub-</p>

	Industry Scheme		<p>quality benefit gains.</p> <p>Require clarification around applying for consent to produce food, and other primary products, on my land. I have concerns around the costs and the background/knowledge level of the planner approving my consent. I am in priority sub-catchment (therefore I am a Permitted Activity until 1 January Assuming consents will not go past the proposed start date of 2026 for Plan Change 2, my consent will be for (). The only positive of applying for a 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 an appropriate length of time i.e. at least 10 years.</p> <p>Oppose a NRP because there should not a number that controls my ability to manage my land in the way I see fit. My FEP will provide a risk based mitigation plan to reduce all my diffuse discharges. Additionally, the 2014/2015 and 2015/2016 financial years occur when the payout was low, therefore my on-farm inputs were lower. This is not a true representation of the past use of land.</p> <p>Also, Overseer is the only available tool for me to generate my NRP, but it was never designed as a regulatory tool; only as a great management tool.</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-meter, and</p>	<p>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 around how long a FEP will be viable for.</p> <p>Provide clarification around stock exclusion requirements i.e. setback buffers and where to measure setback from on undulating land.</p>
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4.36	3.11.5.7 Non-Complying Activity Rule – Land Use Change	Oppose	<p>Schedule 1 the buffer is based on slope.</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 • 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 • I am unable to rotationally arable crop in my dairy farm system because my cropping area is over 4.1 ha. Therefore, I cannot convert my cropped area back into pasture without a non-complying consent. This will also limit the amount of supplement feed I can grow on my farm, meaning I must purchase feed from suppliers which will be more expensive. • Overall will largely affect the local, regional and national economy. <p>Overall this rule undermines Objective 2, 4, 5 and Policy 1, 2, 5 and 9.</p>	<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 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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P48 Table1 –Overseer Settings

-support using whole area of property

-climate data –amend to use either overseer or property specific data from metservice/NIWA etc (covers farms with a change in altitude and/or a large area as overseer rainfall data is not that accurate in those cases and can under estimate rainfall by 30% or more)