

**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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I am not a trade competitor for the purposes of the submission. 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.

If others make similar submissions, I would consider presenting a joint case with them at the hearing.

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I am not available as I am currently overseas.

Signature

date

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Introduction

Thank you for the opportunity to submit on the Waikato Regional Councils proposed Plan Change 1.

My name is Megan Coup and although I am currently overseas I hope you will consider my submission.

I completed my BSc (Hons) at Canterbury University in 2012 and then held the position of Waikato Regional Council Resource Officer for the Variation 5 Project from Nov 2012 – June 2015.

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The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following table. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan, including Objectives, Policies, or other rules, or restructuring of the Plan, or parts thereof, to give effect to the relief sought.

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
<p><i>Provision</i> Rule 3.11.5.7 Non Complying Land Use Change</p>	I oppose/support	<p>The reasons for this are:</p> <p>If the rule allows a mixed system farm (eg. Forestry, sheep and beef) to move such farming activities to the most suitable location on the farm, such that the total area of highest leaching land use (eg. Sheep and beef) does not change, then the applicant supports this rule.</p> <p>However, if the rule does not allow any flexibility around the specific location of such farming activities, the applicant opposes this rule.</p>	<p>I seek that the provision is: Deleted in its entirety.</p> <p>The rule should be overridden with Land Use Capability, in which Farm Environment Plans stipulate the appropriate use for the land.</p>
<p><i>Provision</i> Rule 3.11.5.3 Nitrogen Reference Point produced for the property.</p>	I oppose	<p>The reasons are:</p> <p>The plan proposes the establishment of a NRP (Nitrogen limit using historical farm data from the 14/15 year. This is similar to the benchmarking process used for the WRC Lake Taupo Variation 5 regulation. While using historical data to establish a Nitrogen limit overall results in the least economic disruption to farming businesses in the</p>	<p>Suggestions:</p> <ul style="list-style-type: none"> Land Use capability, allocating Nitrogen limits based on the environmental capability of the property as a whole, is a fair, environmentally friendly approach to managing farming which is financially sustainable in

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		<p>short term, a number of social, environmental and economic flaws exist with this approach.</p> <p>Social: this approach “rewards polluters” and disadvantages farmers who are currently operating a lower nitrogen leaching operation. From 2012 to 2015, during my time as WRC resource officer for the Variation 5 Project, I observed that the process of benchmarking was the main cause of angst and disharmony amongst the farming community. Many farmers , especially those given a low nitrogen limit, believed that the process was unjust and that they had been treated unfairly for being a “good” farmer. In some cases benchmarking resulted in a nitrogen cap so low that farming was not financially viable many years after the benchmark date. This resulted in some individuals and families moving out of the catchment, or later making plans to do so, disrupting livelihoods and communities.</p> <p>Environmental:</p> <ul style="list-style-type: none"> • This approach does not necessarily encourage the best use of land, ie that land be farmed according to its physical capability based on soil type, topography, climate etc. Where land is capped at a level higher than its environmental capability, this may result in greater resources being drawn from the land than 	<p>the long term.</p> <ul style="list-style-type: none"> • Land prices are reflective of the environmentally responsible production potential of the land. • LUC also does not require historical farm records. All required data can be obtained publically and therefore can be trusted, with every farmer treated fairly with regard to the inputs that make up the final discharge allowance.

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		<p>is sustainable in the long run.</p> <ul style="list-style-type: none"> • On the other hand, where farmers were not operating at their optimum during the benchmarked year, this may result in them being unable to use their land effectively. I saw a number of farmers in Taupo being unable to use their fixed cap effectively. One example from the Taupo catchment was in a period of too much grass growth in the summer and the farmer was unable to cut or graze this area, it became a fire hazard and glyphosate had to be used to control the cover. • In most cases, benchmarking permits farmers to continue with the status quo. As such, there is incentive or necessity for education and the adoption of more sustainable practices. • If the ultimate goal of such regulation is long term protection of the environment, we need to change the approach that one views nitrogen (and other waste water contaminants) as a personal right to one that views it as an environmental right. <p>Economic:</p> <ul style="list-style-type: none"> • The land value is no longer reflective of the production potential based on the 	

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		<p>environmental capability, but rather historical data.</p> <ul style="list-style-type: none"> • For a property capped at a level below its land use potential, there is no ability for the maximum sustainable economic potential to be returned to the farmer. • Benchmarking is resource intensive. For variation 5 each farm took anywhere from 8-40+ hours to benchmark (depending on the farm size and complexity, assumptions made, requesting further farm data, issues with Overseer modelling, reviewing the report and explanations to land owners.) • Where benchmarking records have not been kept or where farmers do not have records that can be verified (eg. Cropping data) farmers may be disadvantaged. 	

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Yours sincerely [j1]

Print Name:

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Signature

Date