

# 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	
<b>FOR OFFICE USE ONLY</b>			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

SUBMISSIONS CAN BE	
<b>Mailed to</b>	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
<b>Delivered to</b>	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
<b>Faxed to</b>	(07) 859 0998 <b>Please Note:</b> if you fax your submission, please post or deliver a copy also
<b>Emailed to</b>	<a href="mailto:healthyrivers@waikatoregion.govt.nz">healthyrivers@waikatoregion.govt.nz</a> <b>Please Note:</b> Submissions received by email must contain full contact details. We also request you send us a signed original by post or courier.
<b>Online at</b>	<a href="http://www.waikatoregion.govt.nz/healthyrivers">www.waikatoregion.govt.nz/healthyrivers</a>
<b>We need to receive your submission by 5pm, 8 March 2017.</b>	

YOUR NAME AND CONTACT DETAILS		
Full name: Michael Hansen		
Full address: 4 Woodleigh Road, RD2 Huntly		
Email <a href="mailto:Michael.Hansen@alto.co.nz">Michael.Hansen@alto.co.nz</a>	Phone 092333175	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name		
Address for service of person making submission		
Email	Phone	Fax

PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION	
<input type="checkbox"/>	I wish to speak at the hearing in support of my submissions.
<input type="checkbox"/>	I do not wish to speak at the hearing in support of my submissions.

I could not gain an advantage in trade competition through this submission.

**SIGNATURE** **OF** **SUBMITTER**  
*(or person authorised to sign on behalf of submitter)*  
*Signature is not required if you make your submission by electronic means.*

Signature	Date
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Personal information is used for the administration of the submission process and will be made public. All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal information.

## **SUBMISSION POINTS: General comments**

I am a river user for recreational purposes and I own a small sheep and Beef farm in sub catchment 1

I have used the lower Waikato (Huntly area) river for recreational swimming and water skiing every summer for the last 20 years plus, my observations are that in recent years the water quality has been improving. Swimming in the river has never made me sick, my only concern when swimming, is the significant amount of illegally dumped rubbish on the river banks and the volume of “treated” human effluent in the river from all the cities and towns along its path.

Given the known importance of phytoplankton in combating the effects of climate change (by removing carbon dioxide from the atmosphere), which in reality will have the greatest effect on the rivers health over the plans time frame. It's ironic that the plan focuses on reducing nitrogen and phosphorous from the water which are two critical nutrients phytoplankton need to stay alive. In doing so this plan actual has potential to be a negative force on the very thing it's trying to improve.

As a low intensity, small scale sheep/beef farmer I am particularly concerned about the following aspects of Plan Change 1:

- The significant negative effect on rural communities
- The cost and practicality of the rules on small scale operations.
- The effect that the Nitrogen Reference Point will have on my business and my economic wellbeing.
- The Farm Environment plan requirements leading to unnecessary and costly regulation of inputs, outputs, normal farming activity and business information
- The costs and practicality of the rules and requirements for stock exclusion, the Nitrogen Reference Point and the Farm Environment Plan.
- The lack of science and monitoring at the sub catchments level

I wish to be heard at the Hearing.

I am concerned about the implications all of this will have for my family's future and for my current activity as described above. I set out my concerns more specifically in the table below.

**SUBMISSION POINTS: Specific comments**

Page No	Reference (e.g. Policy, or Rule number)	Support or Oppose	Decision sought Say what changes to Plan Change 1 you would like	Give Reasons
	Permitted Activity Rules <b>Rules 3.11.5.1 and 3.11.5.2</b>	<b>OPPOSE</b>	<p>Amend rules 3.11.5.1, and 3.11.5.2:</p> <ol style="list-style-type: none"> <li>1. Incorporate into one rule</li> <li>2. Amend to include as Permitted Activity land uses with stocking rates at or below 18 stock units and enable stocking rate to increase from current up to this standard, or and</li> <li>3. Relate stocking rate or/and nitrogen discharge to the natural capital of soils for sustainable production/ farming;</li> <li>4. Delete 6 stock unit standard</li> <li>5. Apply national stock exclusion requirements which relate to exclusion of cattle, deer, and pigs, from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier, or other technologies) on flat land and rolling land, but not hill country</li> <li>7. Enable flexibility in land use, discharges, and stocking rates up to these standards</li> <li>8. Delete any standards or clauses which hold land uses to historic discharge levels or stocking rates</li> <li>9. Delete standard 4c Rule 3.11.5.2</li> <li>10. Amend riparian setback distances so they only apply too flat and rolling land and not hill country (i.e. slope <math>\geq 15</math> degrees</li> </ol>	<p>As proposed rules 3.11.5.1 and 3.11.5.2 fail to provide for low intensity and low risk land uses and fail to provide flexibility for these land uses.</p> <p>I seek that the rules permitting low intensity land uses and other land uses be amended so that they are consistent with policy 4, and actually provide for small, and low intensity, and low risk farming activities to be enabled. This includes ability to continue if existing, be established, and enabled to be flexible</p>

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	Restricting land use change. Policy 6  <b>Rule 3.11.5.7 and any relevant points within the plan</b>	<b>OPPOSE</b>	Deleted in its entirety. It would be more appropriate to gauge land capability through the Farm Environment Plans (FEP) than to use a blanket prohibition	It impedes any future ability to develop and grow our businesses.
	<b>Schedule B:</b> Nitrogen Reference point	<b>OPPOSE</b>	<p>Nitrogen Reference Point and use of OVERSEER are removed from the plan in their entirety.</p> <p>If nitrogen discharges from a property do have to be allocated, then base the allocation system on the natural capital of soils and the water quality outcomes that are to be achieved for each sub catchment. Do not allocate based on 2014/15 or 2015/16 land use or, grandparenting discharges to these years especially for lower leaching land uses such as drystock.</p> <p>Use FEP's to determine what would work best on each farm, and science to determine which contaminants are an issue in each sub-catchment.</p>	<p>I oppose this grandparenting approach (holding users to their Nitrogen Reference Point). The low emitters are being penalised and the polluters may continue to pollute. There is no scientific evidence that a blanket rule for nitrogen restriction will be of any benefit.</p> <p>It penalises the low emitters – who will no longer be able to develop their farms (they may develop their farms but they will be unable to stock them with these rules) to help pay for the cost of mitigating against the other contaminants.</p> <p>I oppose the use of overseer as a means of determining the NRP – it relies on a wide number of assumptions and can vary depending on the information that is entered into it. It was never designed to be used for this purpose.</p>

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			<p>Amend the rules so that they are effects and science based, not based on grandparenting (holding land uses and land users to historic leaching rates, stocking rates, and land uses).</p> <p>A significant reduction in nitrogen entering the waterways could be achieved by simply requiring that Gorse removal from around all waterways, without the significant negative economic effect on rural communities that this plan currently proposes.</p>	<p>The years chosen to determine the NRP value were drought years, thus stocking rates were very low – this will mean we are restricted to carrying lower numbers of stock (cattle in particular) going forward.</p> <p>The legume gorse (<i>Ulex europaeus</i>) is one of the most widespread nitrogen (N) fixing species and is also one of the most invasive weeds in the Waikato catchment, there is potential for a large environmental impact from the cycling of large amounts of N (up to 200kg/ha annually) fixed by gorse, entering waterways and water bodies, yet the plan is ignoring this known fact?</p>
	<p><i>Stock exclusion</i> <b>Policy 3, Policy 4, Rule 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.4 and Schedule C</b></p>	<p><b>OPPOSE</b></p>	<p>Change the stock exclusion requirements so that they are consistent with the Government's Clean Water Report (February 2017). Change the slope requirements to no greater than 15° as per the Clean Water Report.</p> <p>For cattle and deer on land between 3 and 15 degrees' slope change the exclusion requirements so that they only apply to all permanently flowing waterbodies 1m wide or greater.</p>	<p>This proposal will impose significant costs on my farming activities and will result in a worse environmental outcome.</p> <p>Gorse is a significant problem where I farm, I have spent 10 years removing it from the waterways on my farm, if these are fenced, it will be no longer practical to control it.</p> <p>It's very likely this rule will achieve nothing, in terms of improvement in water quality in my area, given most of the sediment issues in the local lakes are caused by the very high numbers of koi carp. When feeding they stir up the bottom of ponds, lakes and rivers, muddying the water and destroying native plant and fish habitat. Yet the plan isn't considering this known fact?</p> <p>Stock actually seldom choose to deliberately enter waterways.</p>

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	Removal of northeastern (Hauraki) portion of Plan	<b>OPPOSE</b>	Place the plan process on hold, or withdraw the plan in its entirety until the lower catchment is re inserted into the plan at which time the plan can be notified as a whole.	Removal of a significant section of the lower catchment from PC1 means that people are now not able to determine whether this plan will achieve its objectives and whether the costs on individuals is appropriate.
	<i>Farm Environment plans</i> <i>Policy2, Rules 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.4, 3.11.5.5, 3.11.5.6, 3.11.5.7</i> <b>Schedule 1</b>	<b>OPPOSE</b>	Amend FEP requirements to: <ol style="list-style-type: none"> <li>1. . Change thresholds for mandatory stock exclusion to nationally recommended standards (Clean Water Report February 2017). <ol style="list-style-type: none"> <li>a. Only applies up to a slope of 15 degrees for deer and cattle</li> <li>b. Only applies to waterbodies 1m or wider for cattle and deer on land between 3 and 15 degrees slope</li> </ol> </li> <li>2. Accept that fencing required above the 15 degree threshold for intensive farming operation (&gt;18su/ha). eg winter cropping and strip grazing of dairy cows on hill country.</li> <li>3. Rather than the currently proposed input standards (riparian setbacks, limitations on cultivation etc.), mitigations should instead be set on a farm by farm basis and focused on management of "critical source areas"</li> <li>4. Rules should be focused on reducing impacts from intensive agriculture &gt;18su/ha rather than applying blunt and inappropriate rules to extensive agriculture</li> <li>5. <b>FEP's should be produced by the landowner with WRC guidance and</b></li> </ol>	Support the intention of using FEP to identify critical source areas on farm and target management actions and environmental mitigation to address these issues.  Are concerned around some of the strict standards being applied through the rules and FEPs, including the timeframes.

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			<p>support as suggested above for Implementation Methods 3.11.5.3</p> <p>6. Delete 5(a) and enable flexibility in nitrogen leaching from hill country sheep and beef farming, and land uses which are low impact (at or below 20kgN/ha/yr. for example or apply natural capital allocation).</p> <p>7. Timeframes should be deleted, and instead set through consultation with the farmer taking into account their financial constraints, and the sensitivity of the waterbody to any impact.</p>	
	Policy 16	<b>OPPOSE</b>	Deleted in its entirety	I oppose this policy. The ownership of the land should have no bearing on whether the rules apply or not. The issues addressed in this plan are contaminant discharges and the rules should be the same for all regardless of ownership.
	Plan change 1	<b>Oppose PC1</b>	<p>We seek that the plan change should not be implemented until the scientific data around which contaminants are causing water quality decline is available for each sub catchment.</p> <p>Include new or amend existing Objectives, Policies, methods, and rules to enable catchment groups to manage their land and water resources to achieve water quality</p>	<p>Sub catchment approaches to managing land and water resources are a sensible and practicable approach to controlling contaminant discharge and gives each farm, and catchment, ownership over their future.</p> <p>All policy should be consistent with the Governments Clean Water Report (February 2017)</p>

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			outcomes while providing for their economic and social wellbeing and sustainability  All policy should be consistent with the Governments Clean Water Report (February 2017)	