

# 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 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
<b>Emailed to</b>	healthyrivers@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>
<b>Online at</b>	www.waikatoregion.govt.nz/healthyrivers
We need to receive your submission by 5pm, 8 March 2017.	

YOUR NAME AND CONTACT DETAILS		
Full name <b>Oceanview Farms Limited</b>		
Full address <b>260 THOMSON ROAD R.D.2. WAIUKU</b>		
Email <b>ckthornlon@xtra.co.nz</b>	Phone <b>092352856</b>	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name <b>Oceanview Farms Limited</b>		
Address for service of person making submission <b>260 THOMSON ROAD R.D.2. WAIUKU</b>		
Email <b>sothornlon@ps.gen.nz</b>	Phone <b>092352739</b>	Fax

TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i>
<input type="checkbox"/> I could / <input checked="" type="checkbox"/> could not gain an advantage in trade competition through this submission.
<input type="checkbox"/> I am / <input type="checkbox"/> am not 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.

**THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO**

*Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1  
(continue on separate sheet(s) if necessary.)*

**Refer attached separate sheet.**

**I SUPPORT OR OPPOSE THE ABOVE PROVISION/S**

*(select as appropriate and continue on separate sheet(s) if necessary.)*

- Support the above provisions
- Support the above provision with amendments
- Oppose the above provisions

**MY SUBMISSION IS THAT**

*Tell us the reasons why you support or oppose or wish to have the specific provisions amended.  
(Please continue on separate sheet(s) if necessary.)*

**Refer attached separate sheet.**

**I SEEK THE FOLLOWING DECISION BY COUNCIL**

*(select as appropriate and continue on separate sheet(s) if necessary.)*

- Accept the above provision
- Accept the above provision with amendments as outlined below
- Decline the above provision
- If not declined, then amend the above provision as outlined below

*Amend as follows:*

**Refer attached separate sheet.**

**PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION**

I wish to speak at the hearing in support of my submissions.

I do not wish to speak at the hearing in support of my submissions.

**JOINT SUBMISSIONS**

If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

**IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW**

Yes, I have attached extra sheets.

No, I have not attached extra sheets.

**SIGNATURE OF SUBMITTER**

*(or person authorised to sign on behalf of submitter)*

*A signature is not required if you make your submission by electronic means.*

Signature



Date

3.3.17

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.

PLEASE CHECK that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

## Additional sheet to assist in making a submission

Section number of the Plan Change	Support /Oppose	Submission	Decision sought
Please refer to title and page numbers used in the plan change document	Indicate whether you support or oppose the provision.	State in summary the nature of your submission and the reasons for it.	State clearly the decision and/or suggested changes you want Council to make on the provision.
Definition – Nitrogen Reference Point	Oppose	<p>Oppose the use of OVERSEER as the primary model for deriving a nitrogen loss number from a farming activity.</p> <p>The OVERSEER model was not developed to be used as a regulatory tool but has been adopted for this purpose in PC1. The model is inaccurate with version updates affecting the reliability of results.</p>	<p>Remove reliance of PC1 on OVERSEER as the primary model for deriving a nitrogen loss number from a farming activity.</p> <p>This ten year plan should rely only on establishing good management practice for farming activities to reduce or minimise the risk of contaminants entering a water body. Over the next ten years further research and analysis should be undertaken on appropriate methods and approaches to contaminant management for all activities in the catchment from urban and rural activities.</p>
Schedule B – Nitrogen Reference Point	Oppose	<p>Oppose the use of OVERSEER as the primary model for deriving a nitrogen loss number from a farming activity and oppose the reference period being the two financial years covering 2014/2015 and 2015/2016.</p> <p>This period of farming activity was characterised by low payouts and less inputs and is not an accurate or realistic reflection of a typical farming system which will fluctuate with market and environment conditions.</p>	<p>Remove reliance of PC1 on OVERSEER as the primary model for deriving a nitrogen loss number from a farming activity.</p> <p>Should the method be retained then the reference period should be extended to a five year period and the Nitrogen Reference Point being highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period.</p>

Schedule C – Stock exclusion	Oppose	<p>Oppose lack of clarity on waterbodies for the purposes of stock exclusion.</p> <p>Schedule 8 states that water bodies from which cattle, horses, deer and pigs must be excluded:</p> <ul style="list-style-type: none"> <li>i. Any river that continually contains surface water.</li> <li>ii. Any drain that continually contains surface water.</li> <li>iii. Any wetland, including a constructed wetland.</li> <li>iv. Any lake.</li> </ul> <p>The definition should exclude artificial watercourses including farm drainage canals. Farm drains are often a source of stock drinking water and not part of a naturally flowing freshwater system. A farm drain may continually contain water but this may percolate filtering contaminants such as sediment as opposed to flowing to connected natural freshwater systems.</p>	The definition of waterbody in Schedule C should exclude artificial watercourses including farm drainage canals
Rule 3.11.5.7 – Non Complying Activity Rule – Land Use Change	Oppose	Oppose a Non-Complying Activity status for land use change. The rule should focus on new large scale land conversions on land where contaminants cannot be mitigated rather than a blunt tool that affects all farming operations.	Amend Rule 3.11.5.7 to focus on new large scale land conversions on land where contaminants cannot be mitigated rather than a blunt tool that affects all farming operations

<p>Regulatory Framework – Farm Environment Plans, Auditing, Contaminant Management, Nitrogen Limits</p>	<p>Oppose</p>	<p>The plan will have wide ranging effects on rural land users and the viability of farming operations. Rural Production activities must be able to change and adapt to market circumstance and environmental conditions while recognising the need to avoid, remedy or mitigate effects on the environment. PC1 is resulting in financial hardship, stress and an excessive regulatory regime.</p> <p>If PC1 is to proceed rural land users must be supported financially and with the right information and government support to maintain viability.</p>	<p>Provide a support package to maintain the viability of farming activities:</p> <ul style="list-style-type: none"> <li>• Rates review.</li> <li>• Compensation for loss of income and land value.</li> </ul>
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<p>Level Playing Field – Rural and Urban effects</p>	<p>Oppose</p>	<p>Oppose the lack of a level playing field between rural and urban activities and their effects.</p> <p>It is not reasonable that current urban land use can continue to discharge high volumes and levels of contaminants authorised by long term resource consent approvals when the rural community is loaded with high regulation and land use restriction through PC1.</p> <p>Urban intensification is being encouraged in the Waikato and Auckland within existing centres with substandard and/or failing infrastructure discharging contaminants into the Waikato catchment. Noting Auckland discharges wastewater to the Waikato via Tuakau.</p> <p>Furthermore, greenfield growth is being promoted by regional and district councils in the Waikato when science shows that greenfield growth results in a degradation in water quality.</p> <p>As urban development proceeds and continues to degrade water quality the future nutrient allocation framework will be unfairly weighted towards urban activities at the expense of rural production activities and the production of food to feed the urban activities.</p>	<p>Resource consent terms should be the same for urban and rural activities.</p> <p>PC1 should require the point and non-point discharges from urban land use to be addressed within the same regulatory framework and timeframes as rural activities.</p> <p>Urban intensification and greenfield development that degrades water quality in the Waikato catchment should be avoided.</p>
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