

To: Waikato Regional Council
Private Bag 3038
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Submission on: Proposed Waikato Regional Plan Change 1: Waikato and Waipa River Catchments

Date: 8 March 2017

Submission by: Brigid Verry
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- *I do not wish to speak at the hearing in support of my submission*
 - *I will not gain a trade competition advantage through this submission.*
 - *I will be directly affected by the Proposed Waikato Regional Plan Change 1*

Background

I reside on a 1.9.6ha equestrian and grazing lifestyle block at Karapiro on the outskirts of Cambridge. And was part of the study done by Waikato Federated Farmers for the Farm Environment Plan Project.

Introduction

I welcome the opportunity to make this submission on Plan Change1. I acknowledge the significant time and resources that Waikato Regional Council has engaged in the development of PCI through the Collaborative Stakeholder Group.

This submission will solely focus on Plan Change1 as it impacts lifestyle properties and those properties under 20ha that are not part of a larger enterprise.

Submission Summary

I do support the intent of Plan Change1 as the first stage, and recognise Councils legal obligations to give effect to the Vision and Strategy and National Policy Statement for Freshwater Management.

I accept that Plan Change1 is the first part of an 80-year journey to achieve the goals of the Vision and Strategy. And have concerns on how it impacts small properties, run as lifestyle blocks, with various classes of stock over the year.

I see "everyone is part of the problem so everyone needs to be part of the solution" and that everyone needs to be working together towards reducing their environmental footprint with regards to contaminant losses that impact the Waikato and Waipa River catchments.

Decision Sought

I seek the following decision on my submission on Plan Change1

That Waikato Regional Council retains Plan Change 1 but amends as per the decisions sought as outlined in Attachment 1 of this submission.

That Waikato Regional Council makes any consequential amendments that may be necessary to give effect to this submission and help the lifestyle block owner manage their properties within the Plan Change 1

Signed: _____

Date: 2017

Attachment 1: Plan Change provisions

	Section of Plan Change	Provision and page number	Support Or Oppose	Reason for Submission	Decision Sought
	3.11.5.1	Permitted Activity Rule pg39	Support in part	<p>I support the intent of this rule, that recognises that low intensity managed properties between 2 and 4ha produce minimal contaminant loss in relation to the total quantum for the catchment and therefore should be permitted for this Plan Change to include all the properties under 20 ha .</p> <p>There needs to be information gathered that will provide useful data in regards to these small properties, which will assist all parties concerned to have knowledge on the impact on the water quality of the catchment . Often lifestyle properties have little understanding of contaminant pathways.</p> <p>I therefore consider that the information gathering process of Plan Change1 presents a further opportunity to provide feedback to the property owners on how to manage their properties and minimise contaminant losses, and initiate better practice in a non regulatory regime. This I believe will facilitate and improve any transition that needs to be made in future plan changes.</p>	<p>Retain provision and add by way of amendment to 3.11.5.1 or by way of another provision in Plan Change1 that the information gathered from lifestyle blocks is also used to inform and educate these property owners of potential environmental impacts and appropriate mitigations.</p>
	3.11.5.2	Permitted Activity Rule pg40	Support in part	<p>This submission only relates to properties less than 20ha and no comment is made in regards to 3.11.5.2.4</p> <p>I support the intent of this rule which is to require smaller lifestyle and low intensity properties to at a minimum not increase their contaminant losses (3.11.5.2.3(b)(i)). My issue is as the rule is written, any</p>	<p>That 3.11.5.3 is amended so that 3.11.5.2(b)(i) provides for any increase in stocking rate is done by way of a 5 year rolling average.</p> <p>Alternatively that this provision is deleted and properties between 4.1ha and 20ha are treated the same as those</p>

			<p>increase requires a restricted discretionary consent and you are in breach if there is any increase in stock rate, due to natural increase, or any increase at any time, for any length of time. Which is the case of my property as lay over farm for a horses while in transit. And there is no flexibility to allow for management of grass growth, at certain times of the year.</p> <p>Further more <i>"The council does not propose to proactively monitor activities authorised by permitted activity rules 3.11.5.1 or 3.11.5.2. Compliance with these permitted activities will be dealt with by complaint response and through promotional activities to encourage compliance."</i></p> <p>There will need to be better understanding between the lifestyle land owner and the council to be able to work in harmony here. Therefore, I consider it is appropriate and equitable that those on smaller blocks under 20ha be afforded the same flexibility as landowners on larger blocks. That is to have a 5 year rolling average in relation to stocking rate for Rule 3.11.5.2.3(a)(i). There is no further data to be collected by Council as this is already required by 3.11.5.2.5.</p> <p>Alternatively if Council considers that small blocks between 4.1ha and 20ha are relatively low risk would be to delete Rule 3.11.5.2.3(a)(i) and treat these blocks the same as those between 2ha and 4.1ha along with developing an education and engagement plan that clearly identifies that poor</p>	<p>properties between 2ha and 4.1ha.</p>
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				environmental practice in future Plan Changes will be regulated.	
	3.11.5.2	Permitted activity rule pg40	Support in part	<p>Support 3.11.5.2(5) that requires all properties over 4.1ha to provide annually information on stock numbers, fertiliser used and bought in feed, that will complement the information being provided via the NRP and FEP for properties over 20ha, to provide better information on how land is being managed through the catchment that will assist in further decision making.</p> <p>Often on equine properties, the horses diet will primarily be from bought in feed, and these horses are more likely to spend a significant amount of time off paddock, either in yards or stables, so that these losses are easier to manage.</p> <p>Not collecting all relevant information is likely to lead to incorrect conclusions on the impact these properties have on water quality.</p>	That the information to be collected under 3.11.5.2(5) is broadened to collect all relevant information including effluent (manure) disposal and the the use of stand off (stables and yards). Research needs to be done on better management of the effluent storage on the property, and with options to re-cycle the manure for other uses.
	3.11.5.4	Controlled Activity Rule pg42	Support with amendment	<p>Support that landowners are able to manage contaminant loss for their properties with a Farm Environment Plan(FEP) in a controlled activity rule (or permitted activity if in an Industry Scheme).and consider that properties under 20ha should have the same opportunity to comply with Plan Change1 by meeting their Nitrogen Reference Point(NRP) and completing a FEP if unable to meet the permitted activity standards.</p> <p>I believe it is inequitable that properties that do not comply with the permitted activity</p>	Amend 3.11.5.2(3) so that an alternative method of compliance with PC1 for properties under 20ha is to be able to comply with 3.11.5.4

				rules that are under 20ha default to a restricted discretionary activity status where as larger properties are able to undertake a FEP through a controlled activity to meet their obligations.	
	Schedule A	Registration with WRC pg46	Support		Retain
	Schedule C	Stock Exclusion	Support in part	<p>Support that farmed cattle, horses, deer and pigs should be excluded from the waterbodies listed. Support that the rule excludes horses that are being ridden or led.</p> <p>The properties that are over 20ha have the opportunity by a FEP, through either a permitted or controlled activity rule, are allowed to use appropriate alternative mitigations in certain circumstances, whereas it appears those under 20ha if wish to have alternative mitigations to stock exclusion can only do so via a restricted discretionary consent, and at a greater cost to the landowner</p> <p>Thus they should have the opportunity to apply for a FEP as a means to meet their obligations under Schedule C via a controlled activity consent should they wish to do so.</p> <p>And I do question how wild livestock populations are going to be excluded from waterways, and who will be responsible for the exclusion.</p>	That PCI is amended so that small property owners under 20ha also have the option of undertaking a FEP under a controlled activity rule to meet their obligations under Schedule C.

Decision Sought

I seek the following decision on my submission on Plan Change 1

That Waikato Regional Council retains Plan Change 1 but amends as per the decisions sought as outlined in Attachment 1 of this submission.

That Waikato Regional Council makes any consequential amendments that may be necessary to give effect to this submission and help the lifestyle block owner manage their properties within the Plan Change 1

Signed:



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