

# PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 WAIKATO AND WAIPĀ RIVER CATCHMENTS



**Submission form on publicly notified – Proposed Waikato Regional Plan Change 1 – Waikato and Waipā River Catchments.**

**Important: Save this PDF to your computer before answering. If you edit the original form from this webpage, your changes will not save. Please check or update your software to allow for editing. We recommend Acrobat Reader.**

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

SubForm	PC12016	COVER SHEET	
<b>FOR OFFICE USE ONLY</b>			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

## SUBMISSIONS CAN BE

Mailed to	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
Delivered to	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
Faxed to	(07) 859 0998 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
Emailed to	healthyivers@waikatoregion.govt.nz <i>Please Note: Submissions received by email must contain full contact details.</i>
Online at	www.waikatoregion.govt.nz/healthyivers

**We need to receive your submission by 5pm, 8 March 2017.**

## YOUR NAME AND CONTACT DETAILS

Full name: Colin John & Valerie Margaret McKenzie  
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 Email: achindrean@farmside.co.nz  
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## ADDRESS FOR SERVICE OF SUBMITTER

Full name: Colin & Val McKenzie  
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 Phone: 09 2334334 Fax: Nil

## TRADE COMPETITION AND ADVERSE EFFECTS (select appropriate)

- I could /  could not gain an advantage in trade competition through this submission.
- I am /  am not directly affected by an effect of the subject matter of the submission that:
- adversely effects the environment, and
  - 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).

Page 20. 3.11.1 The Vision & Strategy.

We note the above contains the words " where a healthy Waikato River sustains abundant life & prosperous communities who, in turn, are all responsible for restoring & protecting the health & wellbeing of the Waikato River, & all it embraces for generations to come."

From our reading of the proposed Plan Change 1, it seems to only focus on those who currently undertake productive farming activities, Read as Food Production. As such we see the proposed Plan Change as an attack upon the rural community, who interestingly enough, are the front-line in New Zealand's export economy. We see nothing in the proposed plan, where for example, those who own property in surban Hamilton, are expected to contribute towards the objective of this plan change. In our view the proposed plan change fails to meet the Vision & Strategy, as it is not inclusive in sharing the responsibility, amongst the whole community. This point needs to change or we will all be embroiled in an it's not us, it is them debate, probably though the courts for the next 10 years. In the meantime the mountain will only get higher & the rivers will further degrade.

## 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).

In accordance with the Vision & Strategy, whatever the load may be, given the CSG tells us the community has decided this is what it wants, then all residents of the Waikato Region need to be seen to making their contribution towards achieving the aspirational targets set. We support the NPS on Freshwater, but have serious reservations over the aspirational targets as currently proposed & the ability of just the rural community to implement, survive & thrive, through the next 10 year period. Let alone to contemplate that in successive 10 year periods that the screws will be tightened even further. Is it realistic that science can move this quickly in assisting with measures to alleviate the root causes of this issue ? We believe that eventually it will, but are of the view that the time frames laid out are not realistic, & that includes the 80 years.

Is there really a reasonable chance that the rural community all on its own can make significant progress towards the goals as set ? This proposed plan change sets one sector only against the balance of the population of the region, surely you folk can see that, along with the potential consequences.

We believe we should all have a genuine concern over just making the rural community the initial target of this plan, it is in effect setting one part of the community apart from the others. Other relatively low hanging fruit exists. Even if this was just to be to holders of Resource Consents that in say 2 to 3 years time, a reduction in all point source discharges of X will be required where the technology exists to do so.

We do understand every journey starts with a single step.

## 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
- Decline the above provision
- If not declined, then amend the above provision as outlined

**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**

Signature:  Date: 28/2/17

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.

## 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).

Page 33, Policy's 10 to 13 inclusive. Point Source Discharges.

## I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

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- Support the above provisions
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## 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).

We see no reason why any one part of Regional Infrastructure or Industry, should be treated any differently than any other Industry. If it is reasonable to ask one sector of the community to make significant reductions in discharges to the environment, then it must be reasonable for all sectors to be required to do the same.

Having begun to understand the content of plan change 1, back in mid November 2016, to see advertised in the Public Notices of our local newspaper, that Watercare had made application for Resource Consent for their Wastewater treatment plant in Tuakau. Whilst an upgrade to the plant is proposed, they seek a 35 year Resource Consent period, with no reduction in the allowable discharge of Nitrogen. Yes we do understand that given the planned upgrade, actual N discharges will reduce, although future growth in volumes processed are expected.

Quite seriously, it is these sorts of provisions in the proposed Plan Change 1, which treat different parts of our community differently, that gets up Farmers noses. Remember the Vision & Strategy uses the words "are all responsible". I'm sorry but we don't see that.

We are of the view, that these also should be subject to 10 year, sinking lid policy so that the load of change is shared amongst the whole community, not just those environmental villains in the country side.

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Page 36 provision 3.11.4

Whilst we support Waikato Regional Council working with others & the introduction of Farm Environment Plans, as a means of identifying potential improvements in farming operations, we remain skeptical of this process as no hard & fast bottom line actions or requirements are laid out.

As an example we refer you to the provision under 3.11.5.2 where land over a slope of 15 degrees may not be grazed. Which 95 % of farmers would consider, madness, for at least 11 months of the year, & then depend on the degree of soil wetness & the size & type of stock being grazed for the other month.

The only bottom line provided in the proposed Plan Change in regards Farm Environment Plans is that these will be subject to approval by the Chief Executive of the Regional Council, so what does this mean in terms of the physical bottom lines in terms of the what & how & at what level ?

## I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

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

- Support the above provisions
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We all need some certainty in the physical level of the bottom lines, that we expect to be adopted across the region & or catchment, within Farm Environment plans. What & where is that land considered by the CSG that needs to be removed from agriculture & planted in trees ? Can stock in excess of 400 Kg live-weight be grazed on land steeper than 30 degrees, irrespective of the level of saturation & or stocking rate, of the soil etc.

So what will these requirements be, other than a reduction in diffuse discharges, so we can made informed submissions. Farmers & Growers are practical people & need to understand the how. So what are the specified minimum standards ?

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Page 41 Rule 3.11.5.3 Permitted Activity Rule.

Perhaps it is just us, but we are confused by the English as has been used in the first sentence of this. That is specifically "Except as provided in rule 3.11.5.1 and rule 3.11.5.2 the use of the land .....

Is it proposed that rules 3.11.5.1 & 3.11.5.2 will also apply under 3.11.5.3 or not ? Obviously clarification of this point is required prior to making a meaningful submission. The two earlier rules impose more restrictive practices than perhaps may be permitted with the later. Hence given that a specific Farm Environment Plan is to be prepared under the later, we assume that is the Regional Councils intent, we are therefore submitting on that basis. ???

Should our assumption above be incorrect, then we reject completely the provisions of 3.11.5.3

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Given that we consider we are good custodians of the land, & we farm within the capability & capacity of our land, which has been acknowledged as amongst the best soils in New Zealand for Commercial Vegetable production, we take exception to limits being placed on our activities, particularly as we have not used artificial Nitrogen for many years, & our stocking rates are less than 12 per H. We are hardly intensive, need to grow.

It is our belief that our property rights are little different to the Dairy Farming operation 3 properties away, or the extensive beef farm at one end of the minor catchment we live in. The extensive beef farm has publicly stated they use 200 kg N per H per year, as part of a Monitor Farm project, & gee that Dairy Farm grows in the order of 3 to 4 times the volume of grass we are able to grow. Their fertilizer spreader gets plenty of use.

We have over the past few years used hoof & tooth to improve our pastures, including adding modest amounts of traditional fertilizer. We consider that we are a work in progress, & with a stocking rate of less than 12 per H we are certainly well short of those farms which make up the increase from 43% to 63% of N use, which has risen 240% in the 40 years since 1972. Refer to page 64, section 32 report

Surely, we have property rights no different to our neighbors, hence it makes sense that each Hectare of land of an applicable class should have the same obligations in terms of diffuse discharges. We see this as just another small function in the undertaking of a Farm Environment Plan.

It is important that you folk undertaking this Hearing, actually understand that the vast majority of properties have areas just like we have, that would benefit from some further work to improve the environmental outcome. Most landowners would fall into this group. However farming operations need to first meet the needs of those who rely on that for a reasonable living, it is only by making a reasonable profit that funds can be available for additional fencing, the creation of planted out detention areas or the like. This is just simple economics.

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Page 47 Schedule B. The Nitrogen Reference Point.

## 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

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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).

We note that to provide this requires the use of Overseer, as the software to produce the above Nitrogen Reference Point.

Whilst we do not pretend to understand in any great detail Soil Science, what we do understand is that Dr. Doug Edmeades who is a qualified Soil Scientist, & who headed the applicable division of Agrisearch at the time this software was being developed, is adamant that this software was only developed to trial the outcomes of various farm stocking types & policies, to assess their potential outcomes. It was never intended to be a regulatory tool, & the gentleman has publicly stated his opposition to this use. This opinion should be respected.

Clearly then this Hearing Panel needs to form its own view on this highly technical matter. Given the potential economic outcome should the Regional Council get this wrong. In our view it is not good enough to say this is the best tool available. The economic impact, at \$1.1 B per a. for New Zealand is far to great to allow that.

Besides it makes far more sense to us to be focusing any attention on the level of discharge, as opposed to inputs. This simple change in the proposed plan would then open the door to technology & science to be developed which could assist in achieving the sort of outcomes desired under the plan, without the potential of having to wait for the next ten year plan period to roll around so "new" things could be implemented, under the next plan change.

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