

Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

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

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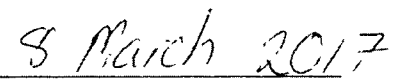
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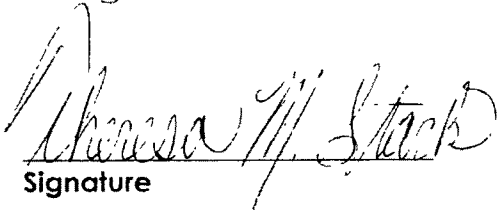
1. **We wish to be heard** in support of this submission.
2. We are not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on our ability to farm. If changes sought in the plan are adopted they may impact on others but we are not in direct trade competition with them.



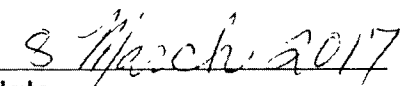
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3. Introduction

- 3.1 Thank you for the opportunity to submit on the Waikato Regional Council's proposed Plan Change 1. We look forward to participation in the submission and further submission processes to assist in shaping a better Plan Change.
- 3.2 We are Steven and Theresa Stark and are sheep and beef farmers in the Rangiriri Sub catchment in the Lower Waikato FMU. I, Steven, have farmed this property for 26 years, first in partnership with my brothers and for the last 14 years with my wife, Theresa. Prior to that, my siblings and I grew up living and working on my parents' dairy farm down the road. They have farmed their property for 51 years. Many of our neighbours have farmed in our area for several generations longer. We are all a part of the fabric of our community.
- 3.3 When my wife and I bought the farm our business plan was to continue to develop the farm out of gorse, subdivide, upgrade tracks and pastures, and fertilize to bring the farm to its full potential. The bank backed this plan and gave us a mortgage, valuing the land on its land type and best use. Our goals are to have a productive farm that provides for our economic and social well-being and to leave the farm in an environmentally better state than when we purchased it. We are doing our bit for Central Government's Business Growth Agenda – Towards 2025 which is to build a more successful economy with more jobs for Kiwis.
- 3.4 Our farm has a variety of land types from highly productive peat soil to hard hill country which is in the process of being developed back to pasture from gorse. We are running what would be considered a low intensity farming operation.
- 3.5 To comply with this plan would require a great deal of labour and funds (Federated Farmers Case Studies 2016, Baker Ag Report 2016). We do not have the funds for mitigations required on our farm and would have to request an increase in our mortgage to fund them. The bank would revalue our land based on its then use and intensity as at 2014/15 or 2015/16 year (whichever we chose for the Nitrogen Reference Point). Land devaluation would occur because the NRP limits our flexibility to change stock intensity to meet climate or market demands. Our enterprise could no longer grow, and with costly mitigations requiring extra funds with no return; our now higher debt-to-equity ratio may be untenable for the bank's risk profiling. Risk profiling, in turn, affects one's credit rating and the ability to borrow (per discussion with our bank manager).
- 3.6 Our local and regional economy is based on primary production and support industries. Farming will continue to support our economy. The success of this Plan Change requires the goodwill and cooperation of landowners. Without that, this Plan Change will not succeed. We, as well as many in the drystock sector, and especially hill country farmers; cannot support this Plan Change in its current form as it does not support our economic and social wellbeing.

Part 1 General Submission

The provisions of PC1 that this submission relates to are:

- a. The whole proposal in its entirety; and without limitation, the general provisions referred to in part 1 and the specific provisions referred to in part 2 of this submission.

Oppose Plan Change 1.

4. CSG Process

- 4.1 We contend the CSG process was flawed. "Sector representatives" were not elected by their peers from their sector and were vetted by WRC staff as to their perceived suitability. If a sector was not happy with how their representative performed, they had no power to remove and reappoint a more appropriate representative. This was not a democratic process and did not provide true sector representation.
- 4.2 As this plan change is about land use and water quality, logic would suggest the sector proportionally covering the largest land area should have had more representation. Drystock has > 370,000 ha of the land involved in the Plan Change area (prior to the northeastern area being withdrawn), yet had only one representative
- 4.3 This process was divisive as representatives were trying to get the best outcomes possible for their sector. For example, dairy who will come out with high Nitrogen Reference Points (nitrogen being a limiter of production and therefore wealth), consistently voted against the drystock sector to have flexibility in their generally lower N emissions, even if they used other mitigations.
- 4.4 The CSG was to achieve consensus decision-making but failed to do so. The drystock sector representative CSG did not support the Plan Change in its current form. This sent a strong message to council. A casting vote of WRC was required to approve this Plan Change to go out for submission, an indicator of the questionability of this plan change to meet the needs and aspirations of our region's residents.

5. Resolution Sought

- 5.1 Due to a lack of complete water quality data, especially at sub catchment level; high-cost mitigations; and restrictive land use policy; our submission consistently asks for a 10-year period to measure and monitor water quality and issues on a sub catchment basis. We consider the measured and staged approach of Ministry for Environment's Clean Water document and its suggestions, a more reasonable and cost-effective approach than the current Plan Change to achieve improved water quality. We have made a good faith effort to comment honestly and constructively to develop a more workable Plan Change document.
- 5.2 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.

Part 2

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
Removal of northeastern (Hauraki) portion of Plan	We oppose this provision	<p>Removal of a significant section of the lower catchment from PCI means that people are now not able to determine whether this plan will achieve its objectives and whether the costs on individuals are appropriate. When dealing with water quality, a sub catchment approach is most logical. Instead, geopolitical lines have been drawn through sub catchments and portions of land along those lines removed from the Plan Change area.</p> <p>There are land owners who now have properties in the included and excluded parts of the plan. This makes the submission process costly and unwieldy for them and other who wish to submit. In our view, this plan change is being used as a political football.</p> <p>Council is letting politics override the water quality in catchment focus required in this plan change.</p>	We seek that the Plan Change process is placed on hold, or withdraw the plan in its entirety until the northeastern catchment is re inserted into the plan at which time the plan can be notified as a whole.
<p><i>Objective 1</i></p> <p><i>Long Term Restoration and Protection of Water Quality for each Sub Catchment and Freshwater Management Unit</i></p>	We support but require amendments	We support the intent and 80-year time frame of this objective but do not believe some of the targets are achievable.	<p>We seek the following:</p> <p>Delete Table 3.11-1 and substitute the minimum standards as set out in Ministry for Environment's <i>Clean Water</i> document published Feb. 2017, publication number ME 1293; and within</p>

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
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<i>Objective 1 continued</i>			<p>the National Objectives Framework in the NPSFWM 2014.</p> <p>Allow movement of water quality within a band.</p> <p>Standards do not have to be upheld during flood events.</p>
<p><i>Objective 2</i></p> <p><i>Social, Economic and Cultural Wellbeing is maintained in the Long Term</i></p>	<p>We support but require amendments</p>	<p>We agree with the intent of this objective but reports to the CSG show it cannot be met.</p> <p><i>"Model output shows that the proposed policy mix will have a significant negative impact on income, employment, and exports within agricultural industries in the Waikato region and those sectors that provide services to them. These impacts are further magnified when connections with industries across the nation are considered."</i> (Pg 20 "Regional- and national-level economic impacts of the proposed Waikato Regional Plan Change No. 1 – Waikato and Waipa River Catchments")</p> <p>Reports to the CSG show loss of value added to the region of \$623m and more than 5,200 job losses. (Pg 11, 12 Integrated Assessment Baseline and Scenarios).</p> <p>This contradicts WRC's own mission statement: <i>Working with others to build a Waikato region that has a healthy environment, a strong economy and vibrant communities.</i> It also goes against</p>	<p>We seek the provision is amended as follows:</p> <p>Social, Economic and Cultural Wellbeing is continuously maintained in the long term.</p> <p>Add: Where there are negative economic impacts on landowners for the public good, public funding must be supplied. (or words to that effect)</p>

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
<i>Objective 2 continued</i>		<p>central government's goal to double primary sector exports by 2025 and against their Business Growth Agenda –Towards 2025 with the goal of building a more successful economy with more jobs for Kiwis.</p> <p>Costs on individual landowners, especially hill country landowners are too onerous for individuals to bear, in many cases, for little to no benefit in water quality. The cost of much mitigation will outweigh the benefits.</p> <p>The socio-economic costs of stress and uncertainty would be valuable to quantify. Farms are not only the backbone of the nation (agriculture accounts for 72% of NZ exports), these small-to-medium size business are also homes to their landowners. It is not easy to turn off business stress when we live where we work. In the short term we are lumped with the economic and time costs of consultants, farm plans/resource consents, monitoring, reporting, fencing, subdivision, increased rates to pay for compliance, etc. In the long term we have no certainty beyond each 10-year plan change.</p>	
<p><i>Objective 3</i></p> <p>Short Term Improvements in Water Quality in the first stage of restoration and protection of water quality for each Sub Catchment and Freshwater Management Unit, Table</p>	We support but require amendments	<p>We think the best approach is to measure and monitor for the first 10 years. Monitoring needs to be done at the sub catchment level and measuring points need to be uniformly placed.</p> <p>Money would be better spent on improving water quality in our catchment by removing koi carp. They erode stream and drainage banks and exacerbate sedimentation and poor clarity of our water bodies. All the good work we do in sending good quality water</p>	<p>We seek that the provision is amended as set out below:</p> <p>Delete the entire paragraph and substitute with words to the effect:</p> <p>Put in place measuring and monitoring mechanisms to 2026 to inform the reduction of discharges, where needed, of nitrogen, phosphorus, sediment and microbial</p>

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
3.11-1		from our properties is immediately undone when it joins water with koi carp present.	<p>pathogens. Instead of Table 3.11-1 substitute the minimum standards as set out in Ministry for Environment's <i>Clean Water</i> document published Feb. 2017, publication number ME 1293; and within the National Objectives Framework in the NPSFWM 2014.</p> <p>Allow movement of water quality within a band.</p>
<p>Objective 4</p> <p>People and Community Resilience</p>	We support but require amendments	<p>We agree with the intent of this objective but reports to the CSG show it cannot be met.</p> <p>Attached are graphs (Pgs 30, 31 WRC document <i>Integrated Assessment Baseline and Scenarios</i>) showing that over the term of PC1, the measures of <i>value add, int'l exports, employment, economic benefit of water, infrastructure and vibrant resilient communities</i> all suffer a worsening trend the longer PC1 is in effect with none of those objectives being met.</p> <p>The reality is, many landowners must fund huge costs for infrastructure (fencing, water reticulation, planting, etc.) within the next 10 years for an 80-year goal. There is no certainty what further rules and regulations will be coming in the next 10-year plan which may negate some of the work and expense done under this plan.</p> <p>For example, hill country farms will, in some cases, spend hundreds of thousands of dollars on fencing and water reticulation now, only to find through future plan</p>	<p>We seek that the provision is amended as set out below:</p> <p>Amend the provision by deleting Table 3.11-1 and substituting the minimum standards as set out in Ministry for Environment's <i>Clean Water</i> document published Feb. 2017, publication number ME 1293.</p> <p>Delete Clause B and require no further cost requirements on landowners for 25 years in order for them to afford the costs of significant investments required under this current plan change.</p> <p>Add: Where there are negative economic impacts on landowners for the public good, public funding must be supplied. (or word to that effect)</p>

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
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Objective 4 continued		allocation and/or natural land capacity only forestry is allowed on that land. This would leave landowners without a business, with sunk costs in useless infrastructure and further in debt for no gain to the community or their family.	
Objective 5 Mana Tangata – Protecting and Restoring Tangata Whenua values	We oppose	<p>We support all New Zealanders being treated equally under the law and that different people value water in different ways. One groups' ideals and values should not be singled out or carry more weight than another's.</p> <p>Flexibility of development of land based on the race of ownership of land is unacceptable. Many non-maori landowners have passed their lands onto succeeding generations, making them ancestral lands to their successors.</p> <p>We all live in the Waikato and value fresh water, our rivers and streams in our own way, and are all working for sound solutions.</p>	We seek that the provision is deleted in its entirety.
Policy 1 Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, Table 3.11-1	I support but require amendments	<p>Farmers farming at low intensity levels are being trapped without flexibility for their farming systems. Climate conditions and market demands often require flexibility to change portions of a farming system.</p> <p>For example, when a drought breaks, often a surge of Nitrogen is released. This could blow your nitrogen budget out the window for the entire year.</p>	<p>We seek that the provision is amended as follows:</p> <p>Manage and require reductions in sub-catchment-wide discharges of nitrogen, phosphorus, sediment and microbial pathogens, by:</p> <p>a) Enabling activities with a low level of contaminant discharge to water bodies provided those discharges do not increase:</p>

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
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Policy 1 continued			<p>Add c) in standards as set out in Ministry for Environment's Clean Water document published Feb. 2017, publication number ME 1293; and within the National Objectives Framework in the NPSFWM 2014.</p> <p>Allow movement of water quality within a band.</p>
<p>Policy 2</p> <p>Tailored approach to reducing diffuse discharges from farming activities</p>	We oppose	<p>We think the best approach is to measure and monitor for the first 10 years. Monitoring needs to be done at the sub catchment level and measuring points need to be uniformly placed.</p> <p>You can't manage what hasn't been measured and what has been measured hasn't been done uniformly. There are a lot of unknowns and arbitrary decisions have been made rather than science-backed decisions.</p> <p>The rules do not take a tailored approach; they take a blanket approach which contradicts this policy. For example, where nitrogen is not an issue, every property must have a nitrogen reference point to farm under. Or the blanket fencing rule where, on many hill country farms, it will have little effect on already good water quality. This rule doesn't walk the talk.</p>	<p>We seek that the provision is deleted in its entirety.</p> <p>We seek the plan change should not be implemented until sound scientific data has been collected as to the water quality issues in each sub catchment. For some it will be sediment, some e coli, some will have a combination of issues, etc. Once the issues are measured and monitored, more targeted and effective solutions can be developed. This is a more cost-effective approach.</p>

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<p><i>Policy 3</i></p> <p>Tailored approach to reducing diffuse discharges from commercial vegetable production systems</p>	We oppose	<p>We think the best approach is to measure and monitor for the first 10 years. Monitoring needs to be done at the sub catchment level and measuring points need to be uniformly placed.</p> <p>You can't manage what hasn't been measured and what has been measured hasn't been done uniformly. There are a lot of unknowns and arbitrary decisions have been made rather than science-backed decisions.</p>	We seek that the provision is deleted in its entirety.
<p><i>Policy 4</i></p> <p>Enabling activities with lower discharges to continue or to be established while signalling further changes may be required in future</p>	I support but require amendments	Because of the significant costs involved, especially for hill country farmers, financial certainty is required for at least 25 years.	<p>We seek that the provision is amended as follows:</p> <p>Delete while signalling further changes may be required in future.</p>
<p><i>Policy 5</i></p> <p>Staged approach, Table 3.11-1</p>	I support but require amendments	We support a staged approach but do not support the targets as set out in Table 3.11-1.	<p>We seek the following: Delete Table 3.11-1 and substitute the minimum standards as set out in Ministry for Environment's <i>Clean Water</i> document published Feb. 2017, publication number ME 1293; and within the National Objectives Framework in the NPSFWM 2014.</p> <p>Allow movement of water quality within a band.</p>

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<i>Policy 5 continued</i>			Standards do not have to be upheld during flood events.
<p><i>Policy 6</i></p> <p><i>Restricting land use change.</i></p>	We oppose	<p>Blanket restrictions on land use change goes against the purpose of the RMA which is sustainable management of natural and physical resource while, among other things, avoiding, remedying, or mitigating any adverse effects of activities on the environment.</p> <p>Blanket restrictions kill flexibility. Not allowing an increase in, for example, phosphorus discharges may be completely unnecessary if phosphorus is not a problem for the sub-catchment's waterways. It is also a theft of private property rights by regulatory stealth.</p> <p>The exception provided for in Policy 16 has no place in a regional plan change on water quality as Policy 16 is based on the race of ownership of land, not on activity or effects.</p> <p>This policy came into effect on notification in October 2016 without affected parties being given the opportunity to submit. This is unacceptable.</p>	<p>We seek that the provision is:</p> <p>Deleted in its entirety and amend</p>
<p><i>Policy 7</i></p> <p>Preparing for allocation in the future</p>	We support but require amendments	<p>Land suitability criteria must include current land use and current water quality, the moderating effects of potential mitigations and non-biophysical criteria (economic, social and cultural).</p> <p>Landowners are being asked in this plan change to invest in 50-60 year infrastructure such as fencing, plantings, water reticulation, wetlands, etc. but are</p>	<p>We seek that the provision is amended as follows:</p> <p>Insert as follows: Preparing for possible allocation in the future.</p> <p>Delete b) Allowance of flexibility of development of lanau'a whenua ancestral</p>

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
Policy 7 continued		<p>given only 10 years of certainty. If land suitability criteria do not take into consideration the mitigations put in at great costs to families and does not consider their economic, social and cultural well-being; this does not meet Objective 2.</p> <p>For example, hill country farmers will, in many cases, pay hundreds of thousands of dollars for fencing and water reticulation only to be told in the next plan change or two that their land suitability is forestry. This will have damaged their economic, social and cultural wellbeing and ability to provide for these things, as required under the RMA.</p>	<p>land; and</p> <p>Delete at Footnote 5: for the avoidance of doubt,</p> <p>Amend at Footnote 5 as follows: Land suitability criteria exclude include current land use and current water quality, the moderating effects of potential mitigations and non-biophysical criteria (economic, social and cultural).</p> <p>Delete: Instead these factors will be of importance in analysing the implications of a completed land suitability classification.</p> <p>Insert at d): Possible future allocation decisions should take advantage of new data and knowledge.</p>
Policy 8 Prioritise implementation	Oppose	<p>We think the best approach is to measure and monitor for the first 10 years. Monitoring needs to be done at the sub catchment level and measuring points need to be uniformly placed.</p> <p>You can't manage what hasn't been measured and what has been measured hasn't been done uniformly. There are a lot of unknowns and arbitrary decisions have been made rather than science-backed decisions.</p>	<p>We seek that the provision is:</p> <p>Deleted in its entirety.</p> <p>Failing that, we seek the provision is amended as follows:</p> <p>Delete Table 3.14-1 and in its place insert the minimum standards as set out in Ministry for Environment's <i>Clean Water</i> document published Feb. 2017, publication number ME 1293.</p>

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<p>Policy 14</p> <p>Lakes Freshwater Management Units</p>	<p>We support</p>	<p>We think the best approach is to measure and monitor for the first 10 years. Monitoring needs to be done at the sub catchment level and measuring points need to be uniformly placed.</p> <p>You can't manage what hasn't been measured and what has been measured hasn't been done uniformly.</p>	<p>We seek that the provision is:</p> <p>Retained</p>
<p>Policy 16</p> <p>Flexibility to development of Maori land returned under Tiriti Waitangi Settlements and multiple owned Maori land</p>	<p>We oppose</p>	<p>We support all New Zealanders being treated equally under the law. One groups' ideals and values should not be singled out or carry more weight than another's.</p> <p>We all live in the Waikato and value fresh water, our rivers and streams in our own way, and are all working for sound solutions.</p> <p><i>"The key factor in considering a policy approach for Maori freehold land under Te Ture Whenua Maori Act 1993 and settlement land is the barriers to development that have been placed upon it, which has reduced or removed the decision making control of the owners over how that land was used (Coffin 2016)." (Section 32 Pg 213).</i></p> <p>These matters should be taken up with central government where changes can be made without disadvantaging Waikato landowners in particular.</p> <p>The purpose of the RMA is to promote sustainable management of natural and physical resources. The Plan Change is not the vehicle to address historical grievances or to correct perceived socio-cultural</p>	<p>We seek that the provision is:</p> <p>Deleted in its entirety</p>

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	SUPPORT / OPOSE	REASON	RELIEF SOUGHT
<p>Policy 16 continued</p>		<p>wrongs and should not be used as a pseudo-Treaty Settlement document.</p> <p>Allowing more land to be developed with the associated increase in diffuse discharges for one race of landowners is unacceptable. The remaining landowners in the catchment are detrimentally affected by further reducing their diffuse discharges to allow increased diffuse discharges from Maori land.</p> <p>PC1 has provisions to hold and reduce contaminants (land use change rule, rules supporting the no increases in discharges from the Nitrogen Reference Point and reduction to the 75th percentile nitrogen leaching value).</p> <p>Allowing Maori to develop land will increase diffuse charges and will exacerbate total nitrogen breaches in the Waikato River at Ohakuri, Whakamaru, Ohaaki. It will also exacerbate total phosphorus breaches under the medium and high development scenarios in the Waikato River at Ohaaki. (Section 32 Pg 215)</p> <p>The principles of WRC's own submission contradicts the effects this policy will have on water quality:</p> <p><i>"14. The catchment is over-allocated, and wide-spread reductions are required in future plan changes in order to meet the long-term objectives. Allowing for increases in discharges during the stage covered by the PPCT could overwhelm the efforts of others to reduce discharges. There is a clear risk that further degradation of water quality in the catchment will</i></p>	

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Policy 16 continued		<p>occur if action is not taken, and that the objectives will not be met."</p> <p>And</p> <p>" 16. An immediate constraint is placed on changing from lower contaminant-discharging land uses to higher contaminant-discharging land uses, effective until 2026. The immediacy of the constraint on changing from lower to higher contaminant-discharging land-use attempts to thwart any negative progress regarding the PPC 1 objectives by the cumulative impacts of further conversions."</p>	
<p>Policy 17</p> <p>Considering the wider context of the Vision and Strategy</p>	We oppose	<p>This plan change is very costly to rural landowners for mitigations required under the plan. To further burden landowners with costs for issues outside the plan is ignoring Objective 2, as was noted earlier.</p> <p>Our concern is that by putting these items in the plan itself, for example wetland values, wetlands begin to creep into consents and farm plans as a requirement. They are costly to construct and are only effective for a time before they become eutrophic. More practical and cost-effective solutions to contaminants are things such as sediments traps.</p> <p>Other real sources of contaminants, such as koi carp have not been addressed here. We consider this policy not necessary, adding extra cost to landowners for public benefit.</p> <p>Biodiversity and wetland values may improve as a result</p>	<p>We seek that the provision is:</p> <p>Deleted in its entirety</p>

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<i>Policy 17 continued</i>		of requirements to mitigate/reduce the four contaminants, but they should not be drivers in and of themselves.	
<p><i>Insert New Policy</i></p> <p><i>Non Point Source Consent Duration</i></p>	Include new policy	<p>Landowners require the ability to stage future mitigation actions to allow investment costs to be spread over time.</p> <p>There needs to be provided appropriate certainty of investment where contaminant reduction measures are proposed.</p> <p>Landowners need to have the same certainty for their consents/farm environment plans as point source consent holders.</p> <p>The magnitude and significance of the investment made or proposed to be made in contaminant reduction measures will be quite significant for hill country farmers.</p> <p>Currently no incentive is provided to landowners beyond the 10-year life of the plan change and there is no certainty or incentive for landowners to invest large amounts of funds, IF they are able to obtain such funding.</p> <p>Water treatment plants can have long consent terms and the CSG estimates 25 years amortization of costs, so this should be the length of time to adjust to the large costs imposed on farming families.</p>	<p>We seek that the provision is:</p> <p>Include new policy which provides for economic, social and cultural certainty for landowners dealing with diffuse discharges</p> <p>The term of a resource consent and/or farm environment plan will be a minimum of 25 years.</p>
<i>Rule 3.11.5.1</i>	We oppose in part	Other regions use 18 stock units as a threshold for low	We seek that the provision is:

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<i>Permitted Activity Rule – Small and Low Intensity farming activities</i>		<p>intensity farming and there is no scientific data to support 6 stock units as cutoff criterion.</p> <p>We think the best approach is to measure and monitor for the first 10 years. Monitoring needs to be done at the sub catchment level and measuring points need to be uniformly placed.</p> <p>Then a tailored approach can be developed for each sub catchment.</p>	<p>Amended as follows:</p> <p>3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities</p> <p>3.11.5.1 5) For grazed land, the stocking rate of the land is less than 6.18 units per hectare; and</p>
Insert new Objectives, Policies, and Rules to enable, support, and incentivize sub catchment planning and land and water management	Oppose PC1	<p>Sub catchment approach to managing land and water resources are a sensible and practicable approach to controlling contaminant discharge and give each farm, and catchment, ownership over their future.</p> <p>We think the best approach is to measure and monitor for the first 10 years. Monitoring needs to be done at the sub catchment level and measuring points need to be uniformly placed. You can't manage what hasn't been measured and what has been measured hasn't been done uniformly.</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 outcomes while providing for their economic and social wellbeing and sustainability</p>
<p>Rule 3.11.5.2</p> <p><i>Permitted Activity Rule – Other farming activities</i></p>	We oppose in part	<p>Other regions use 18 stock units as a threshold for low intensity farming and there is no scientific data to support 6 stock units as cutoff criterion.</p> <p>Criterion of 15 degree slope for grazing was an arbitrary decision. There is no scientific data to support this criterion for grazing.</p> <p>This plan was supposed to be science based but we know some decisions were made on an arbitrary basis.</p>	<p>I seek that the provision is:</p> <p>Amended as follows:</p> <p>3.11.5.2 ... and has more than 6.18 stock units per hectare</p> <p>3.11.5.2 4) c) No part of the property or enterprise over 15 degrees slope is cultivated or grazed (arable cropped)</p>

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
<i>Rule 3.11.5.2 continued</i>		<p>We are very concerned that we, and the landowners being made to implement this plan, do not know the extent of this type of decision-making that has occurred throughout the plan.</p> <p>We think the best approach is to measure and monitor for the first 10 years. Monitoring needs to be done at the sub catchment level and measuring points need to be uniformly placed.</p> <p>Then a tailored approach can be developed for each sub catchment.</p>	Delete any standards or clauses which hold land uses to historic discharge levels or stocking rates.
<i>Rule 3.11.5.4 Controlled Activity Rule - Farming activities with a Farm Environment Plan not under a Certified Industry Scheme</i>	We oppose in part	<p>OVERSEER is not suitable as a regulatory tool. It was not designed as such and can be +/- 30% inaccurate. This is an unacceptable "tool" to use for regulation.</p> <p>From conversations with WRC staff, term of resource consents are likely to be no more than the length of a plan change – 10 years. Consents during the current plan change will most likely expire by 2026. This does not give certainty to hill country farmers who will have massive costs under this plan change, to invest.</p> <p>The resource consent process is costly and time-consuming. Mitigations that may be required such as feed pads, fencing, plantings, water reticulation, wetlands, etc. will have a lifetime of at least 50-60 years. There will be tax to pay on these new capital items as well as increased maintenance.</p> <p>There is no certainty to the farmer that future plan changes will negate the costs of the above</p>	<p>We seek that the provision is amended as follows:</p> <p>Delete 3.11.5.4 iii</p> <p>Delete 3.11.5.4 iv</p> <p>The term of a resource consent and/or farm environment plan will be a minimum of 25 years</p>

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
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<i>Rule 3.11.5.4 continued</i>		infrastructure and a minimum of 25 years is required to amortize and afford the costs.	
<p><i>Rule 3.11.5.7</i></p> <p><i>Non complying activity rule – Land Use Change</i></p>	We oppose	<p>We object to this rule taking effect on notification of the plan change, prior to affected parties being able to submit on it.</p> <p>Land values have historically been set on highest and best use, not necessarily current use. This freezing of land use and intensity will encourage banks to reconsider whether landowners' debt to equity ratios are sufficient to sustain an ongoing business.</p> <p>We purchased our property with a business plan and a bank loan to continue to develop our hill country into pastoral grazing. Having our flexibility frozen, a limiting Nitrogen Reference point assigned, and facing huge costs in fencing and water reticulation for no return, and a decrease in land value; our economic and social wellbeing are now detrimentally impacted. We are surrounded by dairy farms who can continue to emit Nitrogen at a much higher level. This grandparenting approach is unacceptable and is an example of Objective 2 not being met for many landowners, especially hill country farmers.</p>	<p>We seek that the provision is amended as follows:</p> <p>Deleted in its entirety</p>
<p><i>Schedule B</i></p> <p><i>Nitrogen Reference Point</i></p>	We oppose	<p>We think the best approach is to measure and monitor for the first 10 years.</p> <p>You can't manage what hasn't been measured and what has been measured hasn't been done uniformly.</p> <p>Overseer – Tool which was designed to focus on the</p>	<p>We seek that the provision is amended as follows:</p> <p>Farmers will farm to best practice. OVERSEER will be used as an informative, not regulatory, tool at the property level to assist in information gathering for future plan</p>

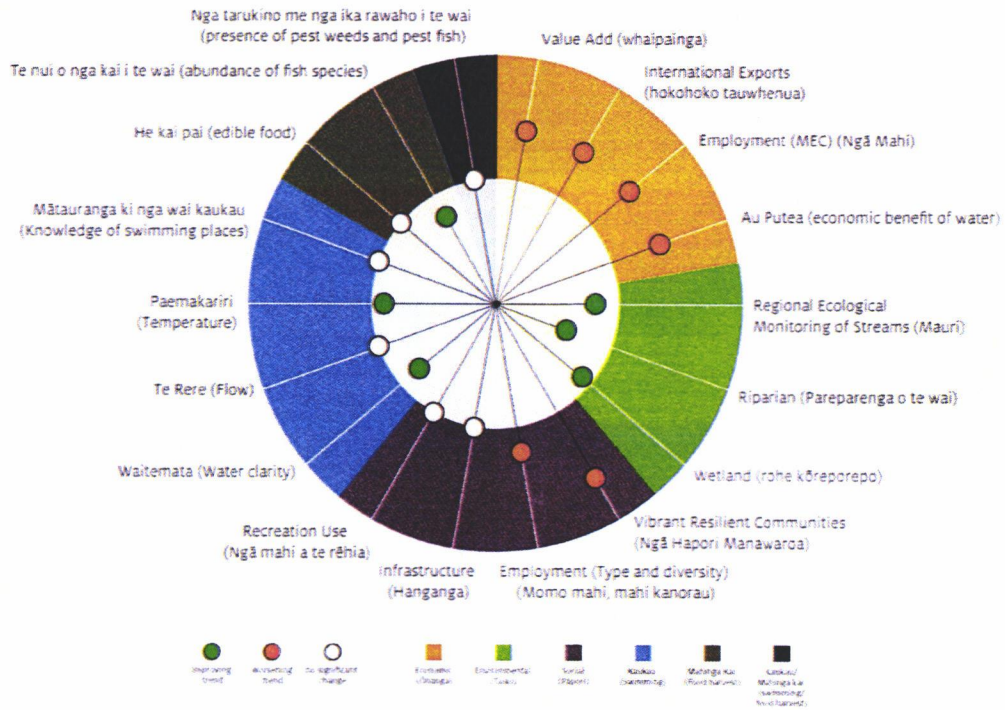
The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
<i>Schedule B continued</i>		<p>trend in nitrate leaching and not on quantitative amounts. The Overseer N leaching model has not been tested or calibrated in all possible combinations of climate, soil type and farm systems. Has a variability of + or – 30%. It should be precluded from being used as a regulatory tool.</p> <p>We consider it useful to use OVERSEER to help farmers measure and manage nitrogen at a property level. It is not to be used in any shape or form as a regulatory tool until it is accurate for such purpose.</p> <p>A farm's ongoing viability and right to farm should not be assessed against a tool not fit for regulatory purposes</p> <p>This is basically grandparenting similar to what happened in Lake Taupo, but there is no government \$82m to assist in the transition or buy out properties</p> <p>There is no incentive for higher emitters to reduce, instead they may emit to the maximum level allowable in anticipation of further future reductions while low emitters remain at current levels (this excludes those over the 75% percentile of N leaching who MUST reduce)</p> <p>We need flexibility in our farm businesses to respond to market demands, weather events, and personal circumstances.</p>	changes.
<i>Schedule C</i>	We oppose in part	Council's requirements are, in some cases, arbitrary and not science based, high cost with little effect, does	We seek that the provision is amended as follows:

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
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<i>Stock Exclusion</i>		not have sound baseline measurements.	Use the minimum standards for stock exclusion as set out in Ministry for Environment's <i>Clean Water</i> document published Feb. 2017, publication number ME 1293.
<i>Schedule 1 Requirements for Farm Environment Plans</i>	We oppose in part	<p>FEPs should be used to measure and monitor for the first plan change. Once all information is collated on a sub catchment basis, we'll have a good starting point for rules and regulation, if required.</p> <p>As it stands, we are a low intensity farming operation that has been slowly replacing gorse-covered land with pasture. We will always be a low intensity operation. Bear in mind, gorse is a high nitrogen leaching source. By replacing that pasture and grazing, we are still low intensity but providing are now providing for our well-being, others well-being by providing jobs, and a stimulus to the local economy. For example, in reinstating pasture, we have employed helicopters and bought weed and pest sprays from local retailers. Then we employ local fencing contractors, shearers, and builders to service and maintain required supporting infrastructure.</p> <p>We need flexibility in our farming management to respond to climate which is out of our control (too much rain, drought conditions), market indicators and seasonal fluctuations. To have a restrictive plan that was written years earlier limiting one's ability to react to the above in a present-day situation is stressful. For example, even market boom prices can be stressful, if</p>	<p>We seek that the provision is amended as follows:</p> <p>Amend FEP requirements to change threshold for mandatory stock exclusion to the minimum standards for stock exclusion as set out in Ministry for Environment's <i>Clean Water</i> document published Feb. 2017, publication number ME 1293.</p> <p>Delete the use of OVERSEER as a regulatory tool. If nitrogen reference points are to be used as a limiting factor at property level, the 5-year rolling average is to be retained.</p>

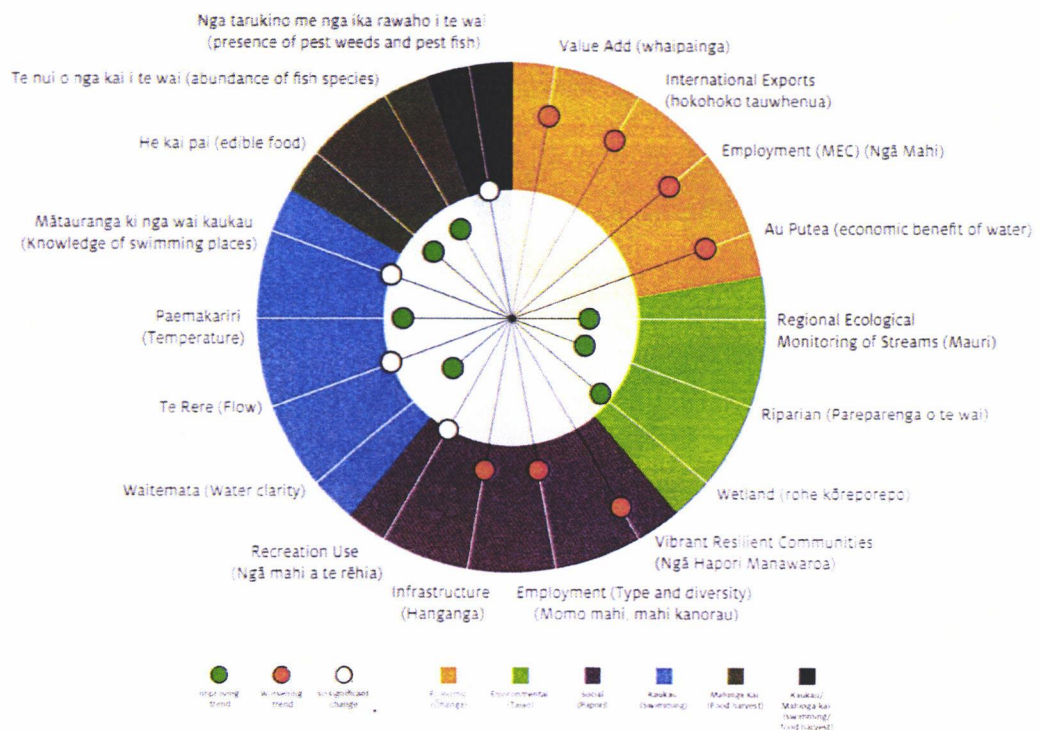
The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
<i>Schedule 1 continued</i>		<p>we cannot temporarily increase stock numbers to take advantage of that. We can only sit and watch while those with higher historical leaching of nitrogen (grandparenting) can take advantage of this benefit.</p> <p>This is erosion of private property rights for public good with no public funding.</p>	
<p><i>Schedule 2</i></p> <p><i>Certification of Industry Schemes</i></p>	We oppose in part	<p>We are concerned there are not enough suitably qualified planners with the required skills to carry out the requirements of this Schedule, i.e.</p> <p>"Have enough knowledge of the potential water quality effects of the farm system they are assessing, for instance vegetable crop production or dairy farming. Understand the requirements of Plan Change 1. Be qualified and skilled in following a structured audit process."</p> <p>Farm Environment plan requirements are difficult to interpret, and hill country farming has additional complexities with regard to slope and fencing requirements</p>	<p>We seek that the provision is amended as set out below:</p> <p>Replace all water quality targets with the minimum standards for stock exclusion as set out in Ministry for Environment's <i>Clean Water</i> document published Feb. 2017, publication number ME 1293; and within the National Objectives Framework in the NPSFWM 2014.</p> <p>Allow movement of water quality within a band.</p> <p>Delete the purposes of Policy 2 or 3 and substitute approach to be used is to measure and monitor for the first 10 years.</p>
<i>Section 32 Evaluation</i>	We oppose	The Section 32 evaluation pertains to the entire Plan Change area, not the Plan Change area that is currently open for submissions. We, the public, do not have a Section 32 Evaluation that corresponds to the Plan Change we are submitting on. We think this fails the requirement	Disregard the current Section 32 evaluation and have a further evaluation carried out on the proposal which the public is currently submitting on.

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
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<i>Section 32 Evaluation continued</i>		of the RMA. It does not contain a level of detail that corresponds to the scale and significance of the effects anticipated from implementation of the Plan Change. It is lacking in robust evaluation. We are concerned at conclusions drawn with minimal analysis. No robust costings were done on mitigations so as to assess the effect on the many small-to-medium enterprises that are carrying out farming operations. Farmers have had to commission their own case studies (Federated Farmers Case Studies 2016, Baker Ag Report 2016) to gain an accurate understanding of the costs of implementation of this plan, but in many places, water quality will benefit little.	

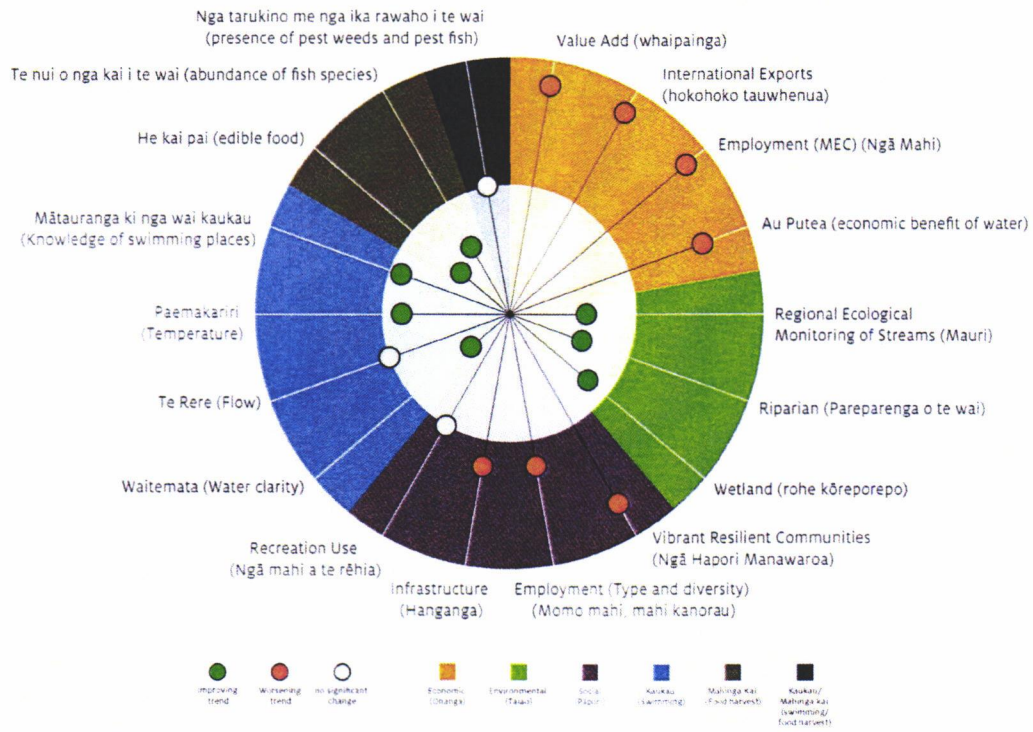
10 per cent



25 per cent



50 per cent



100 per cent

