

# 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	
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		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 <b>Please Note:</b> if you fax your submission, please post or deliver a copy to one of the above addresses
Emailed to	healthyrivers@waikatoregion.govt.nz <b>Please Note:</b> Submissions received by email must contain full contact details.
Online at	www.waikatoregion.govt.nz/healthyrivers

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

## YOUR NAME AND CONTACT DETAILS

Full name: Alan Garrett and Kathy McKay  
 Full address: Flat 1 72 A Seaview Rd Remuera Auckland 1050  
 Email: ngaroma@ihug.co.nz  
 Phone: 021625562 Fax: \_\_\_\_\_

## ADDRESS FOR SERVICE OF SUBMITTER

Full name: Alan Garrett  
 Address for service of person making submission: as above  
 Email: as above  
 Phone: as above Fax: \_\_\_\_\_

## 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 affects 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).

Rule 3.11.5.7 restrictions on land use change

## 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).

Land use change is an essential part of commercial activity from time to time. It facilitates economic and medium to long term use of land in the context of technological advances and the economic resources and requirements of the owner. I appreciate that under the proposal, 4.1 ha may be changed without consent, and that consent will be considered without notification and without the need for written approval of affected persons if the loss of contaminants will be lower than under the existing use. However a margin of 4.1 ha is pretty small on the ground. We would support a rule which permitted an aggregate of 15 ha land use change over the 10 years (as opposed to 4.1 ha), and a clear statement that any consent application for a greater area of land use change will be considered without notification and without the need for written approval of affected persons if the loss of contaminants will be lower across the aggregate property or enterprise than under the existing use of the aggregate property or enterprise. The latter clarification would make clear that land use change within the property with potentially negative effects in one section of the property would be considered in the context of positive effects elsewhere. The classic example might be converting an easy contour section (on which runoff is reasonably controlled) from forestry following harvest, to a predominantly grazing use, offset by retiring an existing steep section of grazing land on which runoff is harder to control.

This would allow landowners reasonable flexibility over time, to plan their farming and conservation activities on a self-sustaining basis. Without the prospect of some flexibility, landowners will be disincentivised to enter into longer term management activities such as forestry for fear that they will lock themselves into high risk long term investment, at the end of which they will be limited to further forestry activity and not have the ability to change land use to take advantage of technology advances such as containment of contaminant. Options for realisation by sale of land by a farmer will be similarly proscribed by a restrictive approach to land use change.

## 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**

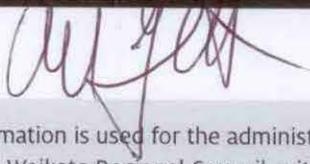
- If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

**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:

6/3/17

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: 3.11.5 Rules

Do you support or oppose the provision?

Support  Oppose

**Submission**

**Decision Sought**

*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.*

In its current land use, our property is stocked at less than 6 units/ha. Accordingly we are not required to compile a farm management plan. However a future owner may wish to stock at greater than 6 units. There needs to be a provision that would allow a future owner to grandfather off the current starting point such as nutrient/contaminant reference point rather than any future starting point. Otherwise the concession for low intensity farming is meaningless as low intensity farms will still need to go to the expense of compiling management plans in order to preserve future realisation options.

allow a future owner to grandfather off the current starting point such as nutrient/contaminant reference point rather than any future starting point.

Section number of the Plan Change: Nitrogen reference point

Do you support or oppose the provision?

Support  Oppose

**Submission**

**Decision Sought**

*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.*

I object to any calculation of a nitrogen reference point, In particular Overseer is known to suffer from material margins of error. If reference points are to be adopted for either nutrients or contaminants, they should be selected so as to be readily measured in a transparent and reliable manner so that responsible farmers are judged only on their own activity and not the activities of others upstream of, alongside, or downstream from them. Risk factors should be identified which are readily measurable on a regular basis, and relevant tests should be developed which would allow farmers to monitor the effects of their farming practices easily and promptly, and affordably. Adoption of calculated measures introduces complexity, encourages manipulation, and does not factor in individual mitigation measures such as land form.

choose reference items that can be measured readily and affordably

**ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION**

**Section number of the Plan Change:** land use credits (new provision proposed)

**Do you support or oppose the provision?**

Support

Oppose

Submission	Decision Sought
<p><i>State in summary the nature of your submission and the reasons for it.</i></p> <p>Farmers fencing off streams and waterways should be provided with rates relief for the relevant land lost, or credit for the change of land use on that land, which credits they can apply to development of other land for farming use (in addition to the current proposal of 4.1ha which we submit should be increased to 15ha in any case).</p> <p>Farmers who are engaged in pest control on their land should also receive land use credits for the reduction in e-coli in rivers and streams. Relevant pests include feral goats, pigs and deer, in addition to opossums, mustelids and rodents.</p> <p>I might add that limiting land use change (or imposing consent application costs on it) will impact on farmers' earnings and compromise the earnings they might otherwise have available for soil and water conservation activities, as well as pest control.</p>	<p><i>State clearly the decision and/or suggested changes you want Council to make on the provision.</i></p> <p>credit farmers with rates relief or land use change credits to compensate for land lost in fencing off waterways</p>

**Section number of the Plan Change:** impact on rural communities

**Do you support or oppose the provision?**

Support

Oppose

Submission	Decision Sought
<p><i>State in summary the nature of your submission and the reasons for it.</i></p> <p>Many rural communities are in serious decline already. Imposing further costs and limiting development options will exacerbate the trend from personal to corporate farming, and decrease the population of farmers and rural workers with personal stakes in the land and personal interest in conserving the land and rivers.</p> <p>What seems to be happening is that a high risk of contamination has been identified, but the remedial action has not targetted that high risk. The high risk arises from land use intensification which has been permitted if not fostered by WRC and central government in the last ten years and more. The proposed remedial action gives the high risk farmers further time to exploit their position, and imposes a regime of cost and rights limitation on the low risk farmers at the same time as the high risk farmers. This is not a tailored approach as stated in Policy 2.</p>	<p><i>State clearly the decision and/or suggested changes you want Council to make on the provision.</i></p> <p>refocus proposed plan on high risk/high intensity contaminant sources such as dairy farms, industry, and town/city discharges. Once that effect is known, decide whether low risk/low intensity farms need to be monitored/ regulated</p>