

**WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 -
WAIKATO AND WAIPA RIVER CATCHMENTS**

Submission Form

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

To: Waikato Regional Council
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I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

I wish to be heard in support of this submission.

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Introduction

Thank you for the opportunity to submit on the Waikato Regional Councils proposed Plan Change 1.

Matt & Olivia Buckley and their 4 children, together with Matt's parents Rob & Marg Buckley, operate a large scale, intergenerational family owned farm business consisting of Beef, Sheep and Dairy. Eight Mile Farms Ltd employs 10 full time staff and 3 part time. The total effective area of land farmed is 3500ha and is made up of 5 properties; Paemako (960ha), Spring Valley (850ha including a 310ha, 660 cow dairy farm converted in 09/10), Waipa (625ha), Rangitoto (580ha) and Waihanga (490ha). Two properties, Paemako and Spring Valley, are in the West Coast Catchment and Waipa, Rangitoto and Waihanga are in the proposed WRC Plan Change 1 Waikato/Waipā River catchments listed as Priority 1. Of the combined 1700ha directly affected by PC1, approximately 200ha is in the Upper Waipa River catchment and 1500ha in the Mangaokewa River catchment.

To date we have placed 300ha under a QEII covenant, with a further 50ha in sustainable forest plantations. We have also undertaken extensive fencing of the major water courses that flow through our various properties.

Matt and Rob are also active members of King Country River Care (KCRC), a group recently formed in response to PC1.

Preamble

We all share the desire to improve the water quality of our rivers, lakes and streams. But the problem of poor water quality belongs to the whole catchment community, not just the rural sector. The rural sector is often portrayed as the environmentally irresponsible ones by the media and environmental groups. We agree that too often cases of mismanagement by a small minority find their way into the national spot light. So rather than regulate all, why not educate these poor practitioners on what best practice looks like. And while the WRC are actively expecting land users to raise their standards, why not partner with interest groups to give leadership of the sub catchment back to the community. After all, a large part of this Plan talks about building resilient people and communities. It also seeks to maintain the social, economic and cultural well being of people and their communities. But we want the rural sector to thrive, not just survive. Unfortunately, certain aspects of this Plan do not support that.

"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, Implementation Methods, Rules or restructuring of the Plan, or parts thereof, to give effect to the relief sought".

"And any consequential amendments arising from the submission point."

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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.

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>Provision</i>	I support/ oppose/ If you support you can support but require amendments	The reasons for this are:	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below As an alternative I propose
<i>Plan Change 1</i>	Oppose	WRC has failed to deliver a workable Plan. It should not be up to individuals to fix the Plan. There is no Implementation Plan. Timeframes to complete many aspects of the Plan are too tight. Much of the Plan does not meet Objectives 2&4.	Amend as set out below. Withdraw PC1 until a workable Plan has been developed.

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>There is too much uncertainty for the future. While we may undertake some of the mitigation work to improve water quality, I am worried that the goal posts will be moved in order to meet these exceedingly challenging targets.</p> <p>Costs of meeting targets are prohibitive to farm businesses even though this Plan is designed to benefit the whole River Community.</p> <p>WRC can expect to encounter little support from land users when it comes to implementation and enforcement of this Plan due to its regulatory approach and lack of stakeholder consultation.</p>	
<p><i>Policy 16</i></p> <p><i>Partial withdrawal of Hauraki Iwi</i></p>	<p>Oppose</p>	<p>Section 32 analysis is fundamentally flawed as it does not provide any viable alternative.</p> <p>This is a very divisive aspect of the Plan and has potential to divide communities.</p>	<p>Amend as set out below.</p> <p>Withdraw PC1 until WRC has decided who participates in the Plan.</p> <p>Would suggest WRC consults with all interested parties to develop a workable Plan not just Iwi.</p>
<p><i>Objective 1</i></p> <p><i>Objective 3</i></p>	<p>Support</p>	<p>Water quality is of paramount importance to our local and regional economies and communities.</p> <p>Water quality targets in this Plan are aspirational. In some cases they exceed those of the 1860's.</p>	<p>Amend as set out below.</p> <p>A Plan that covers the full 80 years be advised to create better certainty for land users and their businesses.</p>

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>Short and long term targets in <i>Table 3.11-1</i> for both the Mangaokewa and Upper Waipa Rivers suggests that only E.coli is of concern. Science would suggest that E.coli cannot be managed by setback margins, therefore does not support Schedule C in its entirety.</p> <p>A NRP is also unnecessary for our sub catchment as <i>Table 3.11-1</i> clearly reports that nitrogen is not a contaminant that needs to be mitigated.</p>	<p>More comprehensive monitoring of waterways is required to determine what contaminant loadings each sub catchment is contributing and who is responsible for them.</p> <p>The setting of more realistic water quality targets.</p>
<p><i>Objective 2</i></p> <p><i>Objective 4</i></p>	<p>Support with amendments</p>	<p>The social, economic and cultural wellbeing of people and their communities is vital to the rural sector.</p> <p>Sadly this Plan does not support these Objectives entirely.</p> <p>The Rural Sector is being held accountable for the shortcomings of a whole region.</p> <p>Urban drift and the decline of Rural populations will only increase due to this Plan.</p>	<p>Amend as set out below.</p> <p>Remove b. from Objective 4. This is creating too much of a moving target.</p> <p>Land users require a Plan that covers the whole 80 year time frame to minimise the uncertainty.</p> <p>There needs to be a more robust economic analysis done on the effects of PC1.</p>
<p><i>Schedule C</i></p>	<p>Support with amendments.</p>	<p>The economic cost does not balance against the environmental gain.</p>	<p>Amend as set out below.</p>

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		<p>It is not practical to exclude stock from all permanent water.</p> <p>Doesn't support Objectives 1&2 of the Plan.</p>	<p>Align the definition of a water body to the National Water Accord.</p> <p>Exclusion costs (i.e. fencing) to be met, or at least subsidised, by the WRC as has happened in the past.</p> <p>Extend timeframes to allow for the completion of the mitigation work.</p> <p>Adjust setback distances according to stream size, topography and practicality.</p>
<p><i>Schedule 1</i></p> <p>3.11.4.3</p>	<p>Support with amendments</p>	<p>FEP's are a way of identifying land users that have always been actively managing contaminant losses.</p> <p>They will also highlight any risk areas that need to be addressed on farm.</p>	<p>Amend as set out below.</p> <p>Extend timelines to complete the FEP's because of a lack of Certified Farm Environment Planners.</p> <p>FEP's need to focus on the land use capability of individual properties rather than widespread generic regulation.</p> <p>The potential high cost of completing a FEP needs to be addressed or subsidised.</p>

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
			Ensure that WRC works with all stakeholders, including sub catchment groups, to develop a technically robust and economically sustainable FEP.
<p>3.11.5.1</p> <p>3.11.5.2</p> <p>3.11.5.3</p>	Support with amendments	Farming should absolutely be a permitted activity under PC1	<p>Amend as set out below.</p> <p>All references to a NRP be removed from the Plan.</p> <p>Remove any clause or reference to the grazing of land over 15 degrees.</p> <p>Include no tillage options on cropping land between 15-25 degrees.</p> <p>Land over 25 degrees only suitable for cropping if the FEP allows i.e. summer crop</p> <p>All water bodies to be defined in line with the National Water Accord.</p> <p>Setback margins adjusted to the size of the water body being fenced.</p>
3.11.5.4	Oppose	Currently there are no Certified Industry Schemes so most farm businesses will fall into this category.	Delete in its entirety.

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>Who is responsible for designing a CIS by 1st July 2020 for Priority 1 sub catchments?</p> <p>Regulating farm businesses in this manner is heavy handed and certainly does not support Objectives 2&4.</p>	<p>At the very least a Certified Industry Scheme needs to be made available to land users.</p>
<p><i>Schedule B</i></p> <p><i>Policy 1</i></p> <p><i>Policy 2</i></p>	<p>Oppose</p>	<p>The grand parenting of nitrogen is inequitable and unfair. It rewards those who have pushed the environmental capability of their properties.</p> <p>Setting the limit by selecting one of two historical years is short sighted.</p> <p>The use of Overseer as a regulatory tool is questionable as it produces results that are highly variable with a poor degree of accuracy.</p> <p>This will have the effect of substantially eroding the value of our properties.</p> <p>It is an unfair process that removes the natural capital of low emitters and transfers it to the higher emitters.</p> <p>A NRP restricts the ability of the land user to manipulate stock classes to capture the best returns in a fluctuating global market place.</p>	<p>Delete in its entirety.</p> <p>It would be better to ascertain the land use capability of individual properties through a robust and economically sustainable FEP.</p>

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		This does not support Objectives 2&4.	
<p><i>Policy 6</i> <i>3.11.5.7</i></p>	Oppose	<p>This will have serious implications for the value of our properties.</p> <p>Pastoral farming has survived because of a land users ability to be able to change land use.</p> <p>Successive farming generations have no certainty for the longevity of their farm businesses.</p>	<p>Deleted in its entirety.</p> <p>Land use capability would be a better way to determine land use identified through the adoption of a FEP.</p>
<p><i>Policy 9</i> <i>3.11.4.5</i></p>	Support	<p>This will identify what the challenges facing each sub catchment are in relation to the 4 contaminants.</p> <p>Ensures that each sub catchment is responsible for any of the 4 contaminants and that each sub catchment is not being asked to help offset any other sub catchments excesses. Raglan has a very good example of the way in which this has worked.</p> <p>Graeme Gleeson from F4PC has conducted an enormous amount of work on the sub catchment approach. The findings and subsequent report on this will be of immense value to the Plan going forward.</p>	<p>Retain as proposed.</p> <p>Ensure that consultation with stakeholders and interested parties is carried out to ensure a high level of support.</p> <p>The best results would be achieved if the ownership of this approach was a partnership between the WRC and sub catchment groups i.e. KCRC, PLUG, F4PC etc</p>

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<i>Policy 10, 11, 12, 13</i>	Support with amendments	<p>Are land users being asked to help offset PSD from regionally significant infrastructure and industry? It would seem so.</p> <p>Consent periods should not mean that levels of contaminants in discharge cannot be improved especially if they contain a disproportionately high level of contaminant discharge relative to the rest of the sub catchment.</p> <p>There seems to be a hint of a double standard as Policy 1 & 2 require reductions in diffuse discharges in the short term.</p>	<p>Amend as set out below.</p> <p>Full disclosure of PSD contaminant levels in each sub catchment are recorded in table form such as 3.11-1.</p> <p>Development of Policies that require reductions in PSD contaminant levels in line with Policy 1 & 2 for diffuse discharge.</p>
<i>Matters of Control Pg 43</i>	Support with amendments	<p>The content of FEP's needs to be developed in conjunction with all stakeholders not dictated to.</p> <p>Dates for the completion of FEP's are too tight.</p> <p>Overseer was never designed to be a regulatory tool.</p>	<p>Amend as set out below.</p> <p>Extend dates for the completion of FEP's.</p> <p>WRC to develop a regulatory tool that has a higher level of accuracy and hence more meaningful outcomes.</p> <p>Design the content of the FEP's with all stakeholders including sub catchment groups i.e. KCRC, F4PC, PLUG</p>

