

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

Submission Form

Submission on a publically notified proposed Regional Plan Change 1 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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Via e-mail: healthyrivers@waikatoregion.co.nz

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Trade Competition and Adverse Effects
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.

Joint Submissions
If other parties make a similar submission to those contained within then we will consider the hearing of these as a joint submission

Heard in Support of Submission
I do not wish to be heard in support of this submission

"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".

Section Number of Plan Change	Support / Oppose	Submission	Decision Sought
<p>Land Use Change</p> <p>Rule 3.11.5.7</p>	<p>Oppose</p>	<ul style="list-style-type: none"> • The land making up the Eru Nikorima Lands Trust comprises 89 hectares at Horohoro and has for sixty years up until the mid-1990s being used for drystock farming. In the mid-90s, a decision was made to enter into forestry to allow the trust to accumulate enough funds to ultimately upgrade the lands in order to produce a more sustainable income via better land use. At that time, the trustees of the lands were aging and by entering into forestry, effectively put the land on hold until a new generation of suitably educated trustees would farm the land more effectively. It was always the intention to transition to other use (as opposed to forestry) as the class of these lands is better than is usual for forestry. This is a legacy of many multiply owned Maori Land blocks. The trees are now almost ready to harvest. Rule 3.11.5.7 would now unfairly preclude us from reverting to superior land use options which were acceptable before and are still acceptable now, and would lock this Maori land block into a single, relatively low-earning land use in perpetuity. • The inability to change land use as determined by this plan bears no link to the productive potential of the land or its possible higher and better land 	<ul style="list-style-type: none"> • It is recognised that Maori land blocks should not be constrained in development of their lands by disallowing low nutrient leaching land use options that have previously been used on that land. • It is recognised that the focus must remain on controlling losses from land based activities but this should not be by a broad brush approach of limiting land use change. • It is recommended that any change should be limited by an appropriate means of gauging a best practice approach to managing losses rather than limiting change full stop.

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		<p>use regardless of potentially reduced nutrient losses.</p> <ul style="list-style-type: none"> • Land based activities have survived to this point by being able to adapt to change in climate, market forces and many other factors outside of the control of land managers. 	
<p>Nitrogen Reference Point and Use of Overseer Rules 3.11.5.2 to - 3.11.5.7 (inclusive) Schedule B and all other areas in PC1 which refer to the Nitrogen Reference Point</p>	<p>Oppose</p>	<ul style="list-style-type: none"> • The setting of a nitrogen reference point based on the 2015 and 2016 financial years is in effect grand-parenting which provides no ability to account for the productive capacity of the land and in effect rewards the historically high emitters and penalises the low emitters. • It is accepted that the nitrogen reference point is an attempt to gain some knowledge of current losses however it should not be used to limit losses going forward given that we are trying to create meaningful solutions for the future that should not necessarily be bound by history. • Limiting future land use in perpetuity simply on what has occurred within a system over two years is extremely short sighted and importantly is an even tighter timeframe than the WRC has used in the past (i.e. Lake Taupo – best of three years) • Simply put – this limits further land development and does not encourage catchment based solutions but rather forces individual farm owners 	<ul style="list-style-type: none"> • Consideration needs to be given to long term averaging of nitrogen losses should the use of the Nitrogen Reference Point be continued with. This gives more ability to cope with year on year changes that frequently occur within biological systems. • Further consideration must be given to alternative tools here such as the use of the natural capital approach • The use of tools such as the MENU’s created by WRC previously need to be more widely utilised as part of the solution toolbox as there are a number of mitigations that are relevant to reducing losses from farms that are not captured (accurately) by Overseer. The solution must look wider than this. • Where Overseer is to be used as part of the creation of solutions then the calculations must be used as a guide only and the focus to be on the trends that are used.

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		<p>to do what is best for them rather than what is best for the catchment and overall river network.</p> <ul style="list-style-type: none"> • This approach does not take into account the significant biological and climatic variation that exists within a farming system over the course of a year nor does it take into account the significant flexibility that must remain for land based activities to remain viable. • It is accepted that Overseer remains the best tool that the industry has to measure and manage nutrient losses from farming systems however it is imperative that the tool is used within its bounds. The significant margin of error that exists within Overseer needs to be taken into account when implementing policy that incorporates its use so as not to rely solely and completely on the numbers that are produced by this programme. 	
<p>Council Powers</p> <p>3.11.5.6 Restricted Discretionary Rule - The use of land for farming activities</p>	Oppose	<ul style="list-style-type: none"> • The ability of the Regional council to hold discretion over the matters i to vii put significant power in the hands of the regional body and will have impact that there is the potential for significant differences in the way land can be farmed and the regulation that sits behind it. 	<ul style="list-style-type: none"> • A unified approach must be taken to timeframes and content of consents issued so as not to create significant disparity across the region on land use and block by block restrictions.
<p>Removal of North Eastern Portion of the proposed plan – 3 December 2016</p>	Oppose	<ul style="list-style-type: none"> • The removal of the Hauraki portion of the plan so as to ensure further consultation with Iwi does not create a cohesive plan. 	<ul style="list-style-type: none"> • The proposed PC1 process needs to be on hold until such time that all and any part of the catchment implicated by the plan is included. If we are to provide consistent solutions for the greater Waikato

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		<ul style="list-style-type: none">• The late withdrawal does little to help create a region wide solution and unity within the region.	as a result of this plan then it is imperative that all that are impacted by and expected to contribute to this plan should be part of the same solution.

Signed

A handwritten signature in cursive script, appearing to read "Hawson".

Date 8th March 2017