

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.**

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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 <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: Gwyneth Ann Verkerk
 Full address: 161 Morrinsville Rd, RD6, Hamilton 3286
 Email: gwyneth.verkerk@gmail.com
 Phone: 0211318234 Fax: _____

ADDRESS FOR SERVICE OF SUBMITTER

Full name: Gwyneth Ann Verkerk
 Address for service of person making submission: 161 Morrinsville Rd, RD6, Hamilton 3286
 Email: gwyneth.verkerk@gmail.com
 Phone: 0211318234 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).

In general: all of it

In particular: wetland development, funding support as low interest loans for work on the land to come from urban rating, the need for better soil science, support for land use for horticulture for the New Zealand market, compliance monitoring, Hamilton City Council's responsibilities, encouraging for riparian planting, nitrogen restrictions for low (bottom quartile) emitters

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).

I give my overall support to the Plan Change 1 proposal – our community has no choice but to fulfill our obligations to implement a plan that will give effect to the Vision & Strategy set out in the Waikato-Tainui (Raupatu claims) River Settlement Act 2010 and to meet targets aligned with the National Policy Statement on Freshwater Management. Plan Change 1, while still imperfect, provides a realistic pathway forwards, while acknowledging that improved water quality will require an intergenerational approach.

It is important that this work starts without delay – the science shows that general deterioration remains continuous, despite the efforts of our more proactive land managers to date. There will be a lag period before the proposed policies and rules have full effect. This could be 20 years to control sediment and pathogens, while the scientists indicate that nitrogen leaching from the upper catchment into groundwater and thence to the river will continue to emerge for even 30 more years. In that context, it is critical that the work starts without delay, and in particular every effort should be made to expedite the further round of hearings and discussion. There is a great deal of work to be done by Waikato Regional Council to implement the Plan Change, and for comprehensive and considered Farm Management Plans to be developed, and then for land managers plan and budget for the works to be done.

The economic modeling work undertaken to support the policy development shows that this first step will not result in regional economic crisis. It is critical that this all keeps moving forward and does not get bogged down by process.

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:

F. M. M. M. M.

Date:

08/03/17

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: Expanding the region's wetlands

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.

While the overall approach to achieve stock exclusion and improved nitrogen accounting as the first step, with future plans pushing further to manage nitrogen emissions, it is very important during these first steps for the overall incorporation of wetlands into farming systems to be sorted out. Long-term achievement of nitrogen goals in our region where agriculture is a critical component of the economic base will only be achieved by ensuring that large areas drain into well-constructed and managed wetlands.

The importance of wetlands in ensuring that our farming practices can continue to be sustainable out for 30, 50 and 100 years beyond the period of Plan Change 1 must be given greater emphasis at this early stage of the plan development. The approach proposed wherein work is managed at sub-catchment level in fact fully lends itself to ensure that this level of planning is considered right from the start.

Section number of the Plan Change: Soil science needed

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.

The current Plan Change and the information that will be gathered in its implementation will enable better frameworks to be developed for future determination of land use suitability. Over time this needs to be reviewed across the entire region and rules put in place to ensure that the nature of the farming activity is appropriate to the Land itself.

An investment in soil science to understand better understand the processes of nitrogen attenuation in the region's soils,

In particular it is imperative that work during the life of Plan Change 1 will result in better scientific understanding of nitrogen attenuation in the regions various soil and subsoil types. This will be the only way that there can be future agreement about which areas are more suitable for farming systems that inherently have higher nitrogen leaching such as horticulture and dairy cows. The corollary is that those operations outside these areas must be able to show how they have contained their N.

ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION

Section number of the Plan Change: Funding to support work on the land

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>Given that much of the conflict which had arisen during debates about Plan Change 1 have rested on an apparent inability of certain farming sectors to afford the work that is required, there needs to be some consideration for mechanisms for the community to provide financial support for land managers. This should be despite calls from other sectors that it should all be "polluter pays"; if indeed this is a significant barrier to achievement of the necessary outcomes, then it is important that such support is put in place as soon as possible.</p>	<p><i>State clearly the decision and/or suggested changes you want Council to make on the provision.</i></p> <p>I would support a targeted rate approach per household across the urban community, wherein that money is accumulated to a fund that is available as long-term loans for approved subcatchment-level wetland development projects on a zero or very low interest basis. This fund could also be supported by those point-source emitters that will in future struggle to meet their targets. and so may be required to pay mitigation.</p>

Section number of the Plan Change: Policy 6: Land Use Change

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>In general I support the proposed restrictions to land use intensification over the ten year period of Plan Change 1, since it is important to limit any changes to land use until the preliminary implementation programme have been achieved.</p> <p>I do however have some concerns regarding the proposed restrictions on land use for horticultural enterprises. While I can agree in principle with the view land area being capped for a period, with increases in production during the life of Plan Change 1 being driven by improved management, in the long term there should be greater flexibility for short term (up to 5 year) land use for horticultural production across a range of farm types, since New Zealand's ability to produce vegetables for its own citizens is paramount.</p>	<p><i>State clearly the decision and/or suggested changes you want Council to make on the provision.</i></p> <p>Greater flexibility for horticulture producers to utilise small parcels of land across the region within their farm rotation systems, provided their purpose is for fruit and vegetable production for the New Zealand market.</p>

Section Number of the Plan Change: nitrogen restrictions for low (bottom quartile) emitters

Disagree

Submission: I am concerned that restricting nitrogen emissions by low emitters is counter-productive to the success of the Plan Change. While reduction of nitrogen levels in the catchment's waterways remains an imperative, the nitrogen hold-and-reduce pathway proposed in Plan Change 1 create a risk that farmers in hill country will struggle financially to implement stock exclusion policies and this will delay what needs to happen on the land.

The scientific evidence is that the approach to drove the top quartile of N emitters down to the 75% percentile, alongside greater implementation of best practice on the balance (in principle of dairy farms) should reduce N emissions by around 10% overall. While on the face of it this would seem to meet the targeted reduction, it will not generally benefit immediate water quality as it is thought that as many as 30 years are needed for current subterranean nitrogen to emerge. Accordingly the rivers will be carrying unpredictable, but generally-agreed large, nitrogen loads to the ocean for some time to come. It seems therefore that management of phosphorus is the critical lever for land managers to engage in the shorter term, to minimise algal blooms and weed growth in the lakes and waterways until an actualised reduction in nitrogen can occur.

Proven tools to reduce phosphate runoff are stock exclusion from waterways and erosion control. The majority of dairy farmers now practice stock exclusion adequately, and some horticulturalists and maize growers apply soil cultivation practices that reduce run-off. Sadly it seems that those farming sectors with the most work to do are those with overall lesser nett profit in their businesses, and in recent months the media has presented a range of declarations to the extent that farmers will not be able to do the work required. This clearly creates a conundrum, since Plan Change 1 places a legal requirement for them to act.

The bottom quartile emitters need to be given some flexibility to change their current farming systems to more profitable activities, and given that nitrogen use and farm income are directly correlated, it would be reasonable to assume that this will be associated with some short-term increases in N emissions from those farms.

Decision sought: That bottom-quartile nitrogen emitters be permitted to increase their emissions by a margin, up to a pre-determined ceiling, with that increase in emissions to be balanced by placing greater restrictions on those in the third (second-from-top) quartile than is proposed, e.g. that this group be required to reduce to the median for their sub catchment.

Section Number of the Plan Change: encouraging for riparian planting

Disagree

Submission: while stock exclusion remains the critical step towards sediment and pathogen reduction, and as a rhetorical term allows greater flexibility (and appropriately so) in the development Farm Environment Plans, it would be good to see some incentive to encourage riparian planting in stock exclusion zones. This has many benefits including increased efficiency of the riparian zone to slow the flow of contaminants and reducing the amount of work required for weed control in the longer term.

Decision sought: an incentive programme to support planting where farmers have completed stock exclusion.

Section Number of the Plan Change: Hamilton City Council's responsibilities

Disagree

Submission: It is notable that three of the top prioritized catchments are largely within Hamilton City. Indeed the city is a relatively large landowner when all the various parks and reserves are considered. There is no clarity in the proposed Plan as to how the urban community should be considered, as the Plan mainly considered urban communities as point sources. In fact there is a suggestion from the available information that contaminants from historical dump sites and the like are entering the waterways, but there is no evident compulsion for the city to be required to do anything about this. This will be a huge gap to achievement of targets if it is not considered, and it is totally unfair to be expecting farmers to make significant and costly changes to both land use and land management without those living in cities also taking on their particular aspects of responsibility.

Decision sought: that the plan puts more specific requirements onto Hamilton City Council to manage water contamination. In particular this might include:

- assessment of "historical" point sources and development of plans for their remediation,
- work to reduce run-off from roads and storm water systems
- regulations to increase the use of grey-water recycling systems
- an education campaign about the benefits of washing cars on the lawn!
- consideration of a way to encourage widespread household use of low phosphate detergent products - could Waikato be declared a "low phosphate detergent zone" with shops/supermarkets encouraged to stock only low-phosphorus products?

Section Number of the Plan Change: Compliance monitoring

Disagree

Submission: Plan Change 1 does not include a great deal of consideration about how compliance will be monitored and what the regulatory penalties for non-achievement will be. What will happen where individual farmers take a recidivist approach and simply refuse to engage with their responsibilities, e.g. by not registering their land, by not providing information, or by refusing to develop a Farm Environment Plan? I have some concerns that WRC staff will be fully absorbed with implementation and there will not be resources for compliance monitoring and enforcement.

Decision sought: greater development of policies and rules to deal with non-compliance