

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

<p>The specific provisions my submission relates to are:</p> <p>State specifically what Objective, Policy, Rule, map, glossary, or issue you are referring to.</p>	<p>My submission is that:</p> <p>State:</p> <ul style="list-style-type: none"> • whether you support, or oppose each provision listed in column 1; • brief reasons for your views. 	<p>The decision I would like the Waikato Regional Council to make is:</p> <p>Give:</p> <ul style="list-style-type: none"> • precise details of the outcomes you would like to see for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you seek
<p><i>Provision</i></p>	<p>I support/ oppose/ and for each whether or not you wish to amend</p> <p>The reasons for this are:</p>	<p>I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below</p> <p>As an alternative I propose</p>

THE FARM

I FARM A 207 Ha PROPERTY AT AROMONA
THE PROPERTY IS IN A HIGH RAINFALL
AREA WITH SOILS RANGING FROM NGAROMA
SANDY CLAY TO PUMICE OVERLAY. THE
CONTOUR IS FROM ROLLING TO STEEP.

THE GREATEST SEDIMENT LOSS COMES
FROM NATIVE BUSH, ON AND ADJOINING,
THE FARM.

THE STOCK POLICY IS DEER 60% SHEEP 30%
CATTLE 10%.

FORESTRY OCCUPIES 4% OF FARM AND
PROPOSE TO INCREASE TO 6%.

Comments on P.C.I.

W.R.C. DID NOT CONSULTATION ON P.C.I
BEFORE IT WAS NOTIFIED. THE C.S.G. HELD
BRIEFING MEETINGS BUT THE COMPLETED
PLAN WAS NOTIFIED WITH 'OBSCENE WASTE'.

ALTHOUGH I ~~AGREE~~ AGREE WITH THE INTENT
TO IMPROVE WATER QUALITY THE ASPIRATIONS
ARE UNREALISTIC AND UNATTAINABLE WITHOUT
DEPOPULATION AND MASSIVE REAFFORESTATION
WITH NATIVE SPECIES.

NO SOCIAL AND ECONOMIC IMPACT REPORT
HAS BEEN PROVIDED AND THERE ARE NO
GUARANTEES FOR THE LONG TERM WELLBEING
OF COMMUNITIES. AS REQUIRED BY THE
R.M.A.

P.C.I SOLELY TARGETS AGRICULTURE AND
HORTICULTURE. IT HAS NO IMPACT ON
URBAN EMATTERS - GIVEN THE SKEWED
COMPOSITION OF THE C.S.G. THIS IS NOT
SURPRISING.

THE 10 YEAR TIME FRAME OF P.C.I IS
TOO SHORT. A 30-35 YEAR TERM WOULD
BE FAR MORE REALISTIC. I WOULD POINT
OUT THAT INDUSTRIAL CONSENTS ARE OFTEN
FOR 35 YEARS

HYDRO DAMS HAVE HAD A HUGE IMPACT ON WATER QUALITY. NO ONE IS SAYING 'GET RID OF THEM' BUT THEIR IMPACT DOES HAVE TO BE FACTORED INTO THE FINAL WATER QUALITY EQUATION.

CARP IN THE LOWER CATCHMENT, FORESTRY TO DAIRY AND THE CONVERSION OF '~~MARGINAL~~' DRY STOCK FARMS TO MARGINAL DAIRY FARMS ARE ALL AREAS WHERE W.R.C. HAS BEEN 'MISSING IN ACTION'. CARP AND INTENSIVE FARMING OPERATIONS ON MARGINAL LAND ARE AREAS WHERE THE GREATEST GAINS COULD BE MADE QUICKLY.

P.C.1 IS A BLUNT ONE SIZE FITS ALL DEBARRE.

I WOULD FAVOUR A SUBCATCHMENT APPROACH WHERE THE PROBLEMS ARE IDENTIFIED AND REMEDIATED.

THE PRESENT PLAN SHOULD BE WITHDRAWN AND A NEW ONE PRESENTED FOR THE WHOLE CATCHMENT INCLUDING NAURAKI.

THE NITROGEN REFERENCE POINT MUST BE REMOVED

"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".

4009

~~FORESTRY~~ FARM TO FORESTRY
PERMITTED ACTIVITY RULES 3.11.5.1 3.11.5.2
AND ANY OTHER RELEVANT RULES

OPPOSE THIS RULE

REASON OPPOSE:-

USE OF NITROGEN REFERENCE POINT
STRINGENT RULES FOR LAND OVER
15° COULD FORCE FARMS INTO FORESTRY
WHICH IS UNSAFE AND UNECONOMIC TO
HARVEST AND INDEED THERE IS NO SURETY
OF BEING ALLOWED TO HARVEST.

DEFINITION OF WATER BODY TOO STRINGENT

RELIEF SOUGHT

REMOVE NITROGEN R.P. - USE LAND
USE CAPABILITY.

REMOVE 6 SU / Ha. REPLACE WITH
WHAT ^{EVER} IS APPROPRIATE FOR FARM.

USE NATIONAL WATERWAY ACTORD AS
WATER BODY DEFINITION.

REMOVE FENCING REQUIREMENT OVER
15° SLOPE - EXPENSIVE + IMPRACTICAL.

RULE 3.11.5.2 - 4c+d REMOVE.

LAND USE CHANGE
RULE 3.11.5.7 AND ANY OTHER RELEVANT RULE

OPPOSE

REASON OPPOSE :-

RESTRICTS ABILITY TO DIVERSIFY AND
INNOVATE
SHOULD BE ONE RULE FOR ALL
GRANDPARENTS NITROGEN
RESOURCE CONSENTS ARE EXPENSIVE

RELIEF :-

REMOVE N. R. P.
ONE RULE FOR ALL.
F.E.P. COULD BE USED

NITROGEN REFERENCE POINT - GRANDPARENTING RULES 3.11.5.3 TO 3.11.5.7 AND ANY OTHER RELEVANT RULES

OPPOSE THIS RULE

REASON OPPOSE :-

GRANDPARENTS NITROGEN DISCHARGE
HIGH EMITTERS CAN CONTINUE TO POLLUTE
FOR 10 YEARS

PENALIZES LOW EMITTERS WHO ARE
LOCKED IN FROM OCT 2016. RESTRICTS
ABILITY TO CHANGE STOCK MIX AND
UTILIZE FEED GROWN IN GOOD YEARS.
YEARS 14/15 AND 15/16 WERE DROUGHT
YEARS FOR MANY AND DO NOT
REFLECT LONG TERM STOCKING RATES.
OVERSEER HIGHLY VARIABLE AND
NOT FIT FOR PURPOSE.

RELIEF SOUGHT

REMOVES N.R.P. FROM PLAN
REMOVES OVERSEER AS TOOL FOR
MEASURING NITROGEN LEACHING.

USE F.E.P AND LAND SUITABILITY
AS PARAMETERS FOR STOCKING RATE.

FARM ENVIRONMENT PLANS

RULES 3.11.5.3 TO 3.11.5.7 AND ANY OTHER
RELEVANT RULES.

SUPPORT WITH RESERVATIONS

RESERVATIONS :-

COST OF CONSULTANTS
MUST HAVE FLEXIBILITY

RELIEF SOUGHT :-

MUST ALLOW FOR VARIABLE SEASONS
PLAN TO BE SUB-CATCHMENT AND
FARM SPECIFIC, PREPARED BY FARMER
WITH REGIONAL COUNCIL INPUT
CHANGE STOCK EXCLUSION THRESHOLD
USE NATIONAL WATERWAY ACCORD
PARAMETERS AS WATERWAY DEFINITION
NO FENCING OVER 15° SLOPE

Stock Exclusion

RULES 3.11.5.1 TO 3.11.5.4 AND ANY OTHER RELEVANT RULES.

OPPOSE THIS RULE

REASON OPPOSE :-

FENCING IS NOT PRACTICAL ABOVE 15° SLOPE
WATER RETICULATION ON STEEP COUNTRY
VERY EXPENSIVE

AS A DEER FARMER THE COST IS
PROHIBITIVE AND WITH A NITROGEN
REFERENCE POINT THE ABILITY TO CHANGE
TO CATTLE IS RESTRICTED.

AFFORESTATION ON MUCH OF THIS COUNTRY
IS NOT AN OPTION OWING TO SAFETY
CONCERNS AT HARVEST AND HIGH
HARVEST COST

TIME FRAME WOULD NEED TO BE
AT LEAST 30 YEARS

NO SCIENCE TO PROVE THAT WATER
QUALITY WOULD IMPROVE

STOCKING RATE TOO LOW.

RELIEF SOUGHT :-

REMOVE REQUIREMENT TO FENCE OVER 15°
DEFINE WATER BODY AS IN NATIONAL
WATERWAY ACCORD.

FENCE TO SUB-CATCHMENT REQUIREMENT
AND IN CONJUNCTION WITH F.E.P.

STOCKING RATE OF 6 S.U PER Ha LIFTED
TO FARM CAPABILITY

SUB-CATCHMENT SCALE PLANNING - CONTAMINANT LOSSES
 RULE 3.11.4'S AND ANY OTHER RELEVANT RULES

SUPPORT IN PRINCIPAL

REASON :-

SUB-CATCHMENT APPROACH IS LOGICAL
 AND WILL GIVE OWNERSHIP TO FARMERS
 WILL IDENTIFY THE PROBLEM AREAS

RELIEF SOUGHT:-

POLLUTION SOURCES MUST BE SCIENTIFICALLY
 IDENTIFIED

CONTAMINATION FROM NON FARM
 SOURCES (ES NATIVE BUSH) MUST BE
 IDENTIFIED WHEN CALCULATING CONTAMINANT
 LOADS.

RECTIFY THE OBVIOUS POLLUTION
 SOURCES FIRST

L. J. Ghil
 08 MAR 2017