

# 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	
<b>FOR OFFICE USE ONLY</b>			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

## SUBMISSIONS CAN BE

<b>Mailed to</b>	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
<b>Delivered to</b>	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
<b>Faxed to</b>	(07) 859 0998 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
<b>Emailed to</b>	healthyivers@waikatoregion.govt.nz <i>Please Note: Submissions received by email must contain full contact details.</i>
<b>Online at</b>	www.waikatoregion.govt.nz/healthyivers

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

## YOUR NAME AND CONTACT DETAILS

Full name: Peter Meier  
 Full address: 192 Jamieson Road, RD1, Te Kauwhata 3781  
 Email: brigittepete@yahoo.com  
 Phone: 07 826 7668 Fax: \_\_\_\_\_

## ADDRESS FOR SERVICE OF SUBMITTER

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

## TRADE COMPETITION AND ADVERSE EFFECTS

- 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 effects 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).*

Please refer to my attached document that has been sent together with this submission form

**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).*

Please refer to my attached document that has been sent together with this submission form

**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 March 2017

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:** Please refer to my attached document that has been sent together with this

**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.*

**Section number of the Plan Change:**

**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.*

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**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.*

## SUBMISSION TO WAIKATO REGIONAL COUNCIL

### ON THE PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 – WAIKATO AND WAIPA RIVER CATCHMENTS

Peter Meier

Meier Farms Ltd

192 Jamieson Road,

RD1

Te Kauwhata 3781

Signed:  Date: 6/3/2017

Comments in relation to this submission:

1. This is a general submission as our farm is in the area under withdrawal. We will make a full submission, with specific reference to our farm once the withdrawn area is re-notified
2. I support the concept of Plan change 1 as the first stage of achieving the vision and strategy of the Waikato and Waipa river Catchments
3. I support the four contaminant focus for healthy waterways
4. I support a staged approach to implementation
5. The plan change should be an interim approach allowing time for research and development and innovation around sub-catchment approaches
6. I support that greatest contributors to contamination should reduce sooner
7. I support the requirement of a tailored farm environmental plan

For more detailed information in relation to our submission, please refer to Attachment 1 on page 2, 3 and 4.

**Attachment 1: Plan Change provisions supported or opposed, detail, our proposal and an explanation for our proposal**

	<b>Issue</b>	<b>Plan section, Page #</b>	<b>Support or Oppose</b>	<b>Detail</b>	<b>Our proposal</b>	<b>An explanation for our proposal</b>
1	Why the focus of landowners only?	Explanatory Statement, Page 8	Support, subject to our proposal	<p>Lack of clarity for submitters to how the Regional plan as described in the Plan Change 1 relates to RMA specifically in relation to other consent holders who discharge to water bodies.</p> <p>The policy focus is on landowners and reducing their contamination to waterbodies, with no clarity on whether there will be changes to others (i.e. non landowners) who discharge.</p>	<p>More information (visibility and clarity) to how Plan Change 1 changes relate to broader discharge activities in the catchments and how they are regulated and if there are any changes planned for those non-landowners who discharge.</p> <p>The investment required of landowners to reduce contamination should be relative to discharges by others e.g. if a council sewage scheme has a theoretical NRP 20 fold of that of the dairy farm next door, what level of mitigation investment would each party need to bring to the table?</p>	To deliver on the aspiration of the Vision and strategy of the Waikato/Waipara rivers, all contamination from all source need to be addressed i.e. from cities, towns, commercial enterprise and from land use activities. If land owners are 'doing their bit' then non-landowners should also have an increase in regulatory requirements including a mitigation investment proportional to their contamination quantum.
2	Natural processes and managing expectations of 'clean water'	Objective 1 Page 27	Support, subject to our proposal	Sedimentation is a natural process as indicated in the NIWA article <a href="https://www.niwa.co.nz/our-science/freshwater/tools/kaitiaki_tools/impacts/sediment">https://www.niwa.co.nz/our-science/freshwater/tools/kaitiaki_tools/impacts/sediment</a> . Consideration should be given to what are natural events without influence of public judgement or pressures	Robust data should be captured for the catchment for cyclical and 'one off' events to ensure that mitigations are for on land activities rather than from contaminations through natural events or processes. Thought should also be given to public response to these such as proactive compliance guidelines.	Landowners should not be held to account over natural processes or events which may influence the four measures including sedimentation. Subjective measures such as clarity an colour may instigate unnecessary compliance activities
3	Everybody should have a part to play	Policy 2 Page 30	Support, subject to all dischargers playing their part	Water quality is a community issue and should have a government (central and regional/local), commercial, industrial, urban and rural interface	There should be a sub-catchment approach to the plan with implementation plans specific to that sub-catchment where all point and diffuse dischargers to waterbodies are involved. Mitigation measures should be proportional to their relative impacts i.e. those that contaminate the most in the subcatchment need to invest most heavily in reducing their contamination	To deliver on the aspiration of the Vision and strategy of the Waikato/Waipara rivers, all contamination from all source need to be addressed where mitigation efforts required should be proportional to their relative impact.

4	Land use changes	Policy 6, Page 32	Oppose	<p>Severe land use change restrictions as described will stifle strong economies and vibrant communities. If contamination through the land use change is neutral as detailed in a FEP, this policy becomes nil and void.</p> <p>Broad brush strokes of a land use change policy is not a smart approach, but allowing for land use change as markets demand whilst ensuring environmental integrity allows for strong local economies and innovations on land</p>	All land use changes should be permitted activities unless the land use change sits outside of the 75 <sup>th</sup> percentile for NRP. FEP's should be the regulatory tool which enables (or not) the land use change	<p>FEP's are the appropriate mechanism 1 not allowing an increase in diffuse discharges and are the regulatory means to seeking assurance.</p> <p>Land use change policy adds an unnecessary layer, with no value add, but incurs cost to landowners and rate payers. In addition it perpetuates the 'grandfathering' or 'allocation' of the NRP, whereas a FEP would contribute to the Vision and Strategy</p>
5	Visibility of an ongoing implementation plan	Policy 7 Page 32	Support, subject to our proposal	Currently a draft implementation plan is in place which does not give certainty to the quantum of investment required of landowners and how this can be planned for	Implementation plans should be final with clear standards and expectations so that budgets can be apportioned appropriately over time and without wasted effort	Transparency of mitigation methods an requirements will ensure they can be planned for with certainty
6	Earthworks for mitigation measures	Policy 11 Page 33	Support, subject to our proposal	There is potential for layers of compliance if there is a requirement for farms to complete a Farm Environmental Plan (FEP), and then require further consents for undertaking mitigation measures as part of that FEP	If mitigation measures are included in the FEP, no additional resource consents should be required i.e. should be all inclusive as part of FEP approval	Avoids duplication and the effect of 'double' compliance. The FEP, when approved by WRC, should also incorporate all approvals relating to the mitigations in the FEP. This will result in less cost and greater landowner engagement
7	Impact of earthworks or other mitigations	Policy 11 Page 33	Support, subject to our proposal	WRC regulatory authority should incorporate policies relating to mitigations activities where there are one off impacts	Impacts such as one off sediment discharge as a result of earthworks required to undertake mitigation measures should be allowed for without triggering non-compliance action from WRC	Farmers should be able to undertake mitigation measures in good faith and use best practice methodology without fear of repercussions or prosecutions
8	Viability of farms and resource requirements for those affected by the Plan change	Method 3-11-4.3 Page 36	Support, subject to our proposal	Delivering on legal requirements borne out of Treaty and freshwater legislation has effectively been passed onto landowners. The plan change should not put landowners in a position where financially they are in the red and trying to work in the 'green'. The focus should be that farms can work in the black and be empowered to work in the green. If the proposed plan change threatens economic viability of farms then a perverse outcome will be that farmers cannot give effect to environmental	A fund or other mechanism is established to support and enable landowners to fully fund environmental initiatives as indicated in their FEPs. Improving on water quality should be a fair and equitable process involving all people in the community.	There needs to be an agreed funding system to support landowners, particularly farmers where layout costs for implementing FEP's threaten their livelihood e.g. funds for riparian fencing and planting, construction of wetlands, livestock crossings

				initiatives.		
9	Overseer as a fit for purpose tool?	Schedule B, Page 47	Support subject to our proposal	Overseer was not a designed to be a regulatory tool for councils. There is uncertainty about whether Overseer would stand up to independent scrutiny from scientists and modellers in relation to its proposed use in Plan Change 1. Inherently models have shortfalls and limitations and these need further exploration. Of particular note, the inability of Overseer to model all types of mitigations that a landowner may want to put in place	Further work is done to ascertain whether Overseer is the appropriate tool. Heavy reliance is placed on the NRP value to drive the mitigations. Greater clarity is also needed to understand the inter-relationship between modelled NRP's, the reality on the ground and the impact and return on investment of mitigation work on NRP values and the regulatory implications	There should be absolute transparency between what the model (Overseer) calculates, the on the ground mitigation investment and the assessments by accredited persons
10	Streamlining efficient use of planning resource for FEPs	Rule 3.11.5.3 Page 41	Support, subject to our proposal	Increased expense of developing a new industry of FEP professionals when expertise already is 'in-house	Use current primary sector professionals such as farm consultants who hold relationship with farmers to be accredited to undertake FEP consultation. Qualifications should be the same for those professionals who establish the NRP or for developing FEP's	Streamlining those involved in the work to reduce costs to the landowners, and to the ratepayers