

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

Submission form on publicly notified – Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

SubForm	PC12016	COVER SHEET	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

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	healthyrivers@waikatoregion.govt.nz <i>Please Note: Submissions received by email must contain full contact details. We also request you send us a signed original by post or courier.</i>
Online at	www.waikatoregion.govt.nz/healthyrivers
We need to receive your submission by 5pm, 8 March 2017.	

YOUR NAME AND CONTACT DETAILS		
Full name Quintin Owen Lichtwark		
Full address 311 Henry Road, Taupiri		
Email Quin.lichtwark@farmside.co.nz	Phone 0298246646	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name		
Address for service of person making submission		
Email	Phone	Fax

TRADE COMPETITION AND ADVERSE EFFECTS (select appropriate)
<input type="checkbox"/> I could / <input checked="" type="checkbox"/> I could not gain an advantage in trade competition through this submission.
<input type="checkbox"/> I am / <input checked="" type="checkbox"/> I am not directly affected by an effect of the subject matter of the submission that: (a) adversely affects the environment, and (b) 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.)*

see attached sheets

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 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 below
- Decline the above provision
- If not declined, then amend the above provision as outlined below

Amend as follows:

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

(or person authorised to sign on behalf of submitter)

A signature is not required if you make your submission by electronic means.

Signature

Date 07/03/2017

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	Support /Oppose	Submission	Decision sought
Please refer to title and page numbers used in the plan change document	Indicate whether you support or oppose the provision.	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.
Policy 1 pg30	Support with amendments	<p>Support DairyNZ submission that supports Policy 1 as an overarching policy but it requires more guidance about how this will be achieved.</p> <p>Refer to DairyNZ submission for greater detail.</p>	<p>Amend Policy 1 to add a new clause to set out the course of action to implement Objective 3. Policy 1 should read: <i>Policy 1: Manage diffuse and point source discharges of nitrogen, phosphorus, sediment and microbial pathogens/Te reo translation</i> <i>Manage and require reductions in sub-catchment-wide discharges of nitrogen, phosphorus, sediment and microbial pathogens, by:</i></p> <ul style="list-style-type: none"> <i>a. Enabling activities with a low level or a managed low risk of contaminant discharge to water bodies provided those discharges do not increase; and</i> <i>b. Requiring farming activities to be managed through a tailored, risk-based approach, including;</i> <ul style="list-style-type: none"> <i>i. each farm and enterprise and demonstrating achievement of industry-agreed good management practice, and;</i> <i>ii. pastoral farms with moderate to high levels of nitrogen leaching over a specified amount contaminant discharge to water bodies, or for to reduce their nitrogen discharges; and</i> <i>c. Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes; and</i> <i>d. Analysing and reporting the effects of mitigation actions to demonstrate Objective 3 is achieved, and acknowledging time lags in the water and on the land.</i>
Policy 5 pg31	Support	<p>We support the timeframe of 80 years for achieving water quality targets.</p> <p>This is a responsible timeframe that will allow farmers to manage a staged approach to some of the longer term mitigations that may aid water quality.</p>	No change to reduce this 80 year timeframe.

Policy 7 pg 32	Support subject to making amendments	<p>We support the DairyNZ submission recommending that a risk based approach to managing contaminant discharges is a good approach however greater clarification about direction and expectations adds considerable value.</p> <p>Refer to DairyNZ submission for greater detail.</p>	<p>Retain provisions of the Plan Change that are focused on information and processes needed for plan reviews. The focus should be on the course of action to fill information gaps before WRC commences the review of the Plan Change.</p> <p>Amend Policy 7 to read: <i>Identify and fill information gaps to Prepare for further diffuse discharge reductions and any future property or enterprise-level allocation limits of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will may be required by subsequent regional plans, by implementing the policies and methods in this chapter. To ensure this occurs, research will be undertaken in partnership with technical and industry organisations, in a manner that allows people and communities to understand the social, environmental, cultural and economic implications of the current plan, and engage in debate about any future limits. collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'</i></p> <p>Delete a-d of Policy 7.</p>
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<p>Implementation methods 3.11.4.7 Pg 37</p>	<p>Support subject to making amendments</p>	<p>We support that the WRC should commission independent scientific research to underpin and inform any future plan developments in relation to diffuse discharges.</p>	<p>Support recommended changes in DairyNZ submission be adopted:</p> <p>Amend method 7 so that it reads:</p> <p><i>3.11.4.7 Information requirements to determine the need for property-level limits on diffuse discharges and any future allocation/Te reo translation</i> <i>Waikato Regional Council will take a broad-based and integrated approach to assessing existing information and new information gathered through this Plan Change. It will do this in partnership with other agencies and industries, commissioning research on the effects of property-level limits on waterbodies, and implications for individuals and communities, Gather information and commission appropriate scientific research to inform any future framework for the allocation of diffuse discharges including:</i></p> <ul style="list-style-type: none"> <i>a. If shown to be required implementing processes that will support the setting of property or enterprise-level diffuse discharge limits in the future.</i> <i>b. Researching:</i> <ul style="list-style-type: none"> <i>i. The quantum of contaminants that can be discharged at a sub-catchment and Freshwater Management Unit^ scale while meeting the Table 3.11-1 water quality attribute^ targets^.</i> <i>ii. Methods to categorise and define 'land suitability'.</i> <i>iii. Tools for measuring or modelling discharges from individual properties, enterprises and sub-catchments, and how this can be related to the Table 3.11-1 water quality attribute^ targets^.</i> <i>iv. Spatial variability in how land use and mitigations, and the effect of impounded water in hydro-dams affect water quality at a variety of scales, to analyse where mitigations can be put in place for the least cost to the regional community.</i>
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<p>Definition of Certified Farm Nutrient Advisor and Certified Farm Environment Planner pg</p>	<p>Oppose unless amendments made</p>	<p>We support the DairyNZ submission recommending that Certified Farm Nutrient Advisors are of advanced level. Our concern is that there will be a lack of certified professionals to undertake this certification resulting in a rush of certification of under experienced advisors. Farmers livelihoods and their families wellbeing are impacted strongly if an incorrect N ref point is established which may have far reaching effects on their ability to farm a profitable business. The same concern is true for farm environment planners.</p>	<p>That both Nutrient Advisors and Certified Farm Environment Planners are at an advanced level including appropriate (e.g. 5 years) experience.</p>
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N reference point	Oppose	<p>The N reference point restriction condemns farmers that have low N reference points from lifting production by means available to other farmers who have not taken such a responsible attitude to N use on farm and who now retain the advantage of having a high reference point (and therefore more tools to retain and grow productivity) than those with currently low N reference points.</p> <p>Further, where N reference points are significantly low, and are forced to remain at this point, the policy encourages land value (as a dairy farm) to be of considerably less value upon point of sale due to production limitations compared to those farms whose higher reference point has evolved through their higher historic N management.</p> <p>For example our current N reference point would be <20kg.</p>	<p>Take a sub-catchment average of the reference point to enable high producing N farms to be encouraged to reduce footprint and enable low N farms to have greater flexibility to compete on an even footing.</p>
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<p>Matters of control Pg 43</p>	<p>Oppose subject to amendment</p>	<p>The concept of a 5 year rolling average annual nitrogen loss leads to the assumption that the N loss will have to be established yearly. This will be an additional annual cost to the farmer to pay a professional to generate this figure. Further, such an approach will not account for seasonal variability e.g. a drought where feed may have to be brought on farm for animal welfare purposes which may alter the N loss figure. A better approach would be to assess the annual nitrogen loss every three years to be more cost effective for farmers and to account for seasonal variability. Further, this would enable the Council more time to ensure they have appropriately trained advisors (i.e. advanced level) to undertake this work.</p>	<p>Change from a 5 year rolling average annual nitrogen loss to an assessment every third year.</p>
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