

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

Submission Form

Submission on a publically notified proposed Regional Plan 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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Complete the following

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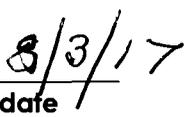
Phone (cell): 0274 417 108

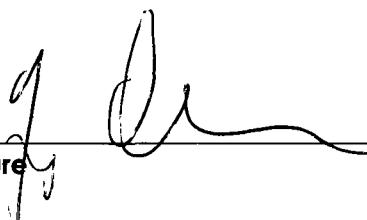
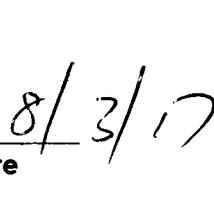
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We are not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on our farming business over time.

We wish to be heard in support of this submission.

 
Signature date

 
Signature date

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Introduction

Thank you for the opportunity to submit on the Waikato Regional Councils proposed Plan Change 1.

My name is Greg O'Connor I make this submission on behalf of R.P. O'Connor & Son (Josie O'Connor, Mike O'Connor & Helen O'Connor – Directors of the company). We have been dairy, sheep and beef farmers at Te Pahu for 3 generations. We manage the land to suit different ages and classes of stock based on the topography of our land. The property is 332 hectares, of which there are numerous waterways, ponds and native bush of which 17 ha has been in the QE11 covenant for approximately 30 years.

We are in the upper catchment area of the Kaniwhaniwha stream. Within the last two years we have taken the opportunity to participate in an extensive planting project with Waikato Regional Council, along sidlings, waterways and pond areas.

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<p>Objective 2</p>	<p>Support this objective with amendments</p>	<p>We believe maintaining the long-term social, economic, and cultural wellbeing of the Waikato Waipa communities is essential to the survival of our rural and urban communities.</p> <p>We are concerned that the plan does not achieve this, as set out below. Enforcement of 3.11.5.4 and 3.11.5.2 will reduce farm profits, land values and community viability; making the objective unachievable.</p> <p>Enforcement of 3.11.5.4 and 3.11.5.2 will reduce farm profits, land values and community viability; making objective 4 People and community resilience unachievable.</p> <ul style="list-style-type: none"> • Sheep and beef production will be frozen, but farm costs will increase • With land values decreasing farmer ability to borrow will reduce <p>Our community will suffer through depopulation and reduced services. The costs of implementation, enforcement and compliance could outweigh the economic benefits proposed, and the plan has the hallmarks of turning into a massive political and bureaucratic snowball.</p>	<p>Amend the objective as the changes proposed significantly impact the survivability of rural and urban communities by placing unrealistic targets on the business of farming. The targets proposed have no measurability. We (the farmer) may spend an extensive amount of money making proposed changes only to be told the changes have not been successful, and are left with an unviable business, bankruptcy and communities in ruin. This would in no way maintain the long-term social, economic and cultural well-being of the Waikato Waipa communities.</p> <p>We would like to see the Council retain and strengthen the objective in relation to providing for the long-term social, economic and cultural well-being of the Waikato Waipa communities. Ensuring the objective considers the economic resilience and sustainability of the people and communities.</p>
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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
<p><i>Objective 1, 3 & Table 3.11-1</i></p>	<p>Support with amendments</p>	<p>We support the principle of clean waterways. However, we are concerned that the table 3.11-1 80 year numerical water quality targets whilst, aspirational and possibly not even achievable under pristine conditions. The population of New Zealand and the use of our land has changed immensely over time. 150 years ago the water in our catchment would have been brown with tanins from the bush, now it is brown from carp (an introduced species).</p> <p>We are concerned that we, farmers, will be penalized because the targets that the council have set are unrealistic, do not take into account our history and are possibly not even necessary.</p>	<p>Retain the intent of Objective 1, but amend Table 3.11-1 so that the water quality targets are realistic and achievable.</p> <p>Water quality targets, should allow for environmental, natural and seasonal weather changes. These aspects should be recognised and not accounted to farming practices.</p> <p>Amend Table 3.11-1 so that the numerical targets do not apply during flood events, and the numerical targets are realistic for farming and community survivability.</p> <p>Water samples need to be taken from rivers below Taupo before and after each town and/or city catchment area to account for possible pollution from urban areas.</p> <p>We would like to see the plan take a sub-catchment approach to allow more specific measurements to be taken from the water directly related to our area. In doing this we can then see which areas discharge which contaminants. We seek that the plan change should not be implemented until the scientific data around which contaminants are causing water quality decline is available for each sub catchment.</p>

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<p>Objective 4</p>	<p>Support with amendments</p>	<p>We support objective 4 in relation to providing for People and community resilience, however as currently proposed the objective fails to provide for this outcome. As currently proposed PC1 will not achieve its objectives and further plan changes including increasing stringency of land use controls will be required (Objective 4b). The outcome is a plan which fails to provide communities and individual's certainty about what will be required of them in the future, and which fails to ensure people and community resilience.</p> <p>The plan fails to provide a pathway for individual and communities to work together to achieve the plan. Our community will suffer through depopulation and reduced services</p> <p>Enforcement of 3.11.5.4 and 3.11.5.2 will reduce farm profits, land values and community viability; making objective 4 People and community resilience unachievable. With land values decreasing farmer ability to borrow will reduce</p>	<p>Amend the objective so that it provides for People and Community resilience over the life of the plan.</p> <p>Numerical Freshwater objectives should not be set if they are not achievable. The plan should clearly set out how it intends to achieve the 80 year outcomes <u>now</u> to provide certainty for people and communities.</p> <p>Delete clause b. Include a new Objectives which provide for People and Community resilience, adaptive management, and sub catchment approaches lead by communities.</p> <p>Delete reference to the staged approach and future plan changes including increasing stringency in land use controls and requirements.</p>

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<p><i>Nitrogen management application of the Nitrogen Reference Point (NRP) & use of OVERSEER</i></p> <p><i>Policy 2 and 7 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</i></p>	<p>We oppose this</p>	<p>We oppose this grandparenting approach (holding users to their Nitrogen Reference Point). The low emitters are being penalised and the polluters may continue to pollute. There is no scientific evidence that a blanket rule for nitrogen restriction will be of any benefit.</p> <p>It penalises the low emitters – who will no longer be able to develop their farms (they may develop their farms but they will be unable to stock them with these rules) to help pay for the cost of mitigating against the other contaminants.</p> <p>I oppose the use of Overseer as a means of determining the NRP – it relies on a wide number of assumptions and can vary depending on the information that is entered into it. It was never designed to be used for this purpose and results can vary by 50%.</p> <p>The years chosen to determine the NRP value were drought years, thus stocking rates were very low – this will mean we are restricted to carrying lower numbers of stock (cattle in particular) going forward.</p> <p>It goes against the RMA section 32.</p>	<p>We seek that the Nitrogen Reference Point and use of OVERSEER are removed from the plan in its entirety.</p> <p>Adopt a sub-catchment approach to addressing contaminants that are relevant to each farm, not a blanket restriction of one particular nutrient that may not even be relevant to the water bodies in that sub catchment.</p> <p>Use FEP's to determine what would work best on each farm, and science to determine which contaminants are an issue in each sub-catchment.</p> <p>Amend the rules so that they are effects and science based, not based on grandparenting (holding land uses and land users to historic leaching rates, stocking rates, and land uses).</p>
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<p>3.11.4.5 Sub-catchment scale planning</p>	<p>We support this Implementation method</p>	<p>This is a sensible and practicable approach to controlling contaminant discharge and gives each farm, and catchment, ownership over their future.</p>	<p>We seek that the plan change should not be implemented until the scientific data around which contaminants are causing water quality decline is available for each sub catchment.</p>
<p>Stock exclusion Policy 3, Policy 4, Rule 3.11.5.1,3.11.5.2, 3.11.5.3, 3.11.5.4 and Schedule C</p>	<p>We support with amendments</p>	<p>The practical and financial impact of these policies have not been fully considered. This rule does not support objective 2 of the plan as it could be socially devastating for the farming community and the communities and small townships who rely on us.</p>	<p>Where the topography of the land is too awkward to fence due to gradient the option of wetland silt traps/silt traps should be available as an option before discharging water downstream. Let the individual FEP present mitigations against contaminants, relevant to each farm, rather than a blanket approach.</p>
<p>Removal of northeastern (Hauraki) portion of Plan</p>	<p>We oppose this</p>	<p>The rules should apply to all regardless of ownership or race.</p>	<p>Place the entire plan process on hold, or withdraw the plan in its entirety until the <i>northeastern (Hauraki) portion of Plan</i> catchment is re inserted into the plan at which time the plan can be re-notified as a whole.</p>
<p>Farm Environment plans Policy 2, Rules 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.4, 3.11.5.5, 3.11.5.6, 3.11.5.7 Schedule 1</p>	<p>Support with amendments</p>	<p>The plan needs to be simple and workable otherwise it will get put in the 'too hard basket' then there will be an element of policing which will cause further frustration around the whole process.</p>	<p>The plan should not create a constant supply of political paperwork for farmers or the Regional Council. The FEP should be a simple document that is workable, simple and to-the-point. These plans could be made to be more like a farm business plans with future focused goals for improvement rather than being regulated by one rule.</p>

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<p><i>Policy 16</i></p>	<p>Oppose</p>	<p>We oppose this policy. The ownership of the land should have no bearing on whether the rules apply or not. The issues addressed in this plan are contaminant discharges and the rules should be the same for all regardless of ownership.</p>	<p>We seek that this policy is removed. The rules should apply to all land regardless of ownership or race – the bearing of Te Tiriti o Waitangi is irrelevant.</p>
<p><i>Restricting land use change.</i></p> <p><i>Policy 6</i> <i>Rule 3.11.5.7 and any relevant points within the plan</i></p>	<p>We oppose this</p>	<p>It affects the value of our land and could impede any future ability to develop and grow our businesses.</p>	<p>Deleted in its entirety. It would be more appropriate to gauge land capability through the Farm Environment Plans (FEP) than to use a blanket prohibition. There are already measures in place to ascertain land value that are appropriate in our economy.</p> <p>We oppose the idea of having to apply for a consent to manage a viable farming business.</p>
<p><i>The Submission process</i></p>	<p>Support with amendments</p>	<p>The process for submission was overcomplicated to the point where submitters felt unable to submit, and were frustrated by the intentional beauracracy of the Waikato Regional Council.</p>	