

Cover Letter for Waikato Regional Councils proposed Plan Change 1.

This word document is part of and to be included as a section of my submission.

I will start by saying that on the whole I agree with the vision that is proposed and a reasonable amount of the strategy and steps that are to be taken. A lot of the dissatisfaction is to do with the way some of it is to be implemented.

As stated in the other part of the submission, we as a farming entity don't want to be stuck with an inflexible Nitrogen Reference Point.

I run a livestock and arable property which is on land suitable for a dairying operation but have not wanted to or felt the need to take this path. It is flexible with it's operational policies with livestock and the arable operation which also includes some leasing of land for reasonably low impact vegetable production.

With what is proposed and the accepted measure limited to what has happened within 1 year is extremely short sighted and ridiculous.

The measure needs to be done by land type and with this I will formally back a sub catchment approach to managing discharges.

This is only a brief outline and expansion of the submission topics will be part of the submission hearings.

Thank you

Richard Kay

# 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	
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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	healthyrivers@waikatoregion.govt.nz <i>Please Note: Submissions received by email must contain full contact details.</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: Richard Kay  
 Full address: 1314 Tahuna Road RD4 Ohinewai 3784  
 Email: greenhvn@ihug.co.nz  
 Phone: 07 8285838 / 0274724918 Fax: 07 82858388

## ADDRESS FOR SERVICE OF SUBMITTER

Full name: Richard Kay  
 Address for service of person making submission: 1314 Tahuna Road RD4 Ohinewai 3784  
 Email: greenhvn@ihug.co.nz  
 Phone: 07 8285838 / 0274724918 Fax: 07 8285838

## 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).*

The use of a Nitrogen Reference Point as referenced in Policies 2 & 3, Objective 3.11.4.11, Rules 3.11.5.2, 3.11.5.3, 3.11.5.4, 3.11.5.5 & supporting notes.

This includes the use of Overseer as the determining tool. Where this is included in the plan.

## 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).*

We don't support the grand parenting of the NRP as a defining standard for locking in a farms ability to be economic & productive.

This restricts a farms ability to be flexible in times of adverse weather conditions & to respond to economic changes.

Low emitters will be penalised disproportionately.

Doesn't take into account mitigation measures or varying soil types.

We don't support Overseer as the tool to be used as a large portion of our property is a very deep organic peat & Overseer & other nitrogen referencing programs are notoriously inaccurate.

## 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:

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: Policy 16; including Policy 7 in part.

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.*

Is this Policy (16) restricted to currently Maori owned land and more specifically, only land obtained at the time of the Treaty settlement. Some of this land has subsequently been sold and other land purchased.

A definite determination of what land is included for the purpose of having Policies 7 & 16 needs to be stated clearly.

I have read where Policy (7) does make reference to suitability of land type for the intended use as this was another concern.

As this Plan Change 1 is about Healthy Waterways it is a concern to see a Policy that effectively is about giving a sector of the community a commercial advantage based on race.

Section number of the Plan Change: Rules 3.11.5; 2. item 4.e.i & ii. incl. items 3,4,5,6. Schedule C

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.*

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Stock exclusion from waterways & cultivation near waterways.  
In general we support the exclusion of stock from waterways on land up to a gradient of 15 degrees. As per the national recommendation.  
In particular I seek clarification about the definitions in Schedule C (Water bodies).

Clarification is sort to these questions.

ii. Who determines the presence of 'continual' surface water, as a wet period in the dry months could coincide with an inspection?

iii. Is there a specific size as to what is deemed a wetland? As ours and many other properties have seepage areas which are wet areas for most of the year but are not of a large area.

Is a constructed pond included under constructed wetland?

**ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION**

**Section number of the Plan Change:** Waterways continued Rule 3.11.5.2; item 4e.i.

**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.*

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Is the proposed 5 metre exclusion for cultivation and 3 metres for livestock only to make it come under the Permitted Activity Rule?  
Is there a proposed distance for cultivation exclusion for Rules 3. to 6?

The cultivation exclusion for low gradient land (ie. flat) should be reduced as this would see an increase in more sprays for weed control being used around water ways with an increased chance of water contamination from this source.

Clarification on any requirement should be included.

**Section number of the Plan Change:** Implementation Methods 3.11.4 item d.

Numerical Tables

**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.*

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This is specifically in regards to the pest fish in the Lower Waikato waterways.  
Has there been work done that has investigated the effect of the Carp & Catfish on their effect in regard to the E. coli and Nitrate concentrations in the waterways?  
How much are they adding to the Nitrate levels and to the E. coli concentration?  
There is more of a degradation of the waterways done by the concentrated numbers of these fish than has been included for in the plan and i would like to see that this is recognised and accepted in the plan.

Support the continued control efforts of the pest fish but want to see more recognition of there degradation effects in the plan. What is proposed for agriculture in the plan may not have as much effect as hoped for with out a full understanding of what these fish are responsible for.

Further submissions added to another form included in email.

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Online at	www.waikatoregion.govt.nz/healthyivers
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## YOUR NAME AND CONTACT DETAILS

Full name: Richard Kay \_\_\_\_\_  
 Full address: Included with first submission form \_\_\_\_\_  
 Email: \_\_\_\_\_  
 Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

## ADDRESS FOR SERVICE OF SUBMITTER

Full name: \_\_\_\_\_  
 Address for service of person making submission: \_\_\_\_\_  
 \_\_\_\_\_  
 Email: \_\_\_\_\_  
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Schedule B addendum to Rules 3.11.5 g.i, iii, iv.

I do not agree to any invoices having to be presented as normally a stock reconciliation would suffice along with fertiliser nutrient records as provided by the fertiliser companies and farm records of supplements traded.

## I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

*(Select as appropriate and continue on separate sheet(s) if necessary).*

- Support the above provisions
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- 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).*

Remove the need for invoices entirely or amend with using suitable farm records.

## I SEEK THE FOLLOWING DECISION BY COUNCIL

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**ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION**

Section number of the Plan Change: 3.11.4.5

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.*

We support a sub catchment scale approach as this will enable the cause and effect to be more specifically attributed and owned by the landholders in a specific catchment.

*State clearly the decision and/or suggested changes you want Council to make on the provision.*

Emphasis should be put on enabling this to be enacted as a way to mitigate contaminants.

Section number of the Plan Change:

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Support

Oppose

**Submission**

**Decision Sought**

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**ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION**

Section number of the Plan Change:

Do you support or oppose the provision?

Support     Oppose

**Submission**

**Decision Sought**

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Section number of the Plan Change:

Do you support or oppose the provision?

Support     Oppose

**Submission**

**Decision Sought**

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