

Form 5

To Waikato Regional Council

Robert Steven Okell

This is a submission on the Operative Waikato Regional plan, plan change 1 Waikato and Waipa River catchments

I will not gain any commercial advantage from my submission. I am just trying to limit the disadvantage that the plan change would have on my ability to farm.

I am directly affected by an effect of the subject matter of the submission that

- a) adversely affects the environment
- b) does not relate to trade competition or the effects of trade competition

My submission relates to the whole plan change

I submit that the Plan change in its current form fails to perform the intentions that are the purpose of the Act. The plan change and actions of the Council have the following effects :

Council despite being required by law to hold the line by statute in 1991, allowed changes of use that altered Nitrogen discharges from 3 kg/Ha from forestry to 40 kg/Ha from Dairy. One reference quotes 40,000 Ha of approved consents for conversions to dairy amounting to an increase in the Nitrogen load by 1,600 tonnes per year. The total N load is quoted as 11,200 tonnes per year. A 10% reduction is 1,120 tonnes so the plan change has a net increase of 500 tonne N load over the first decade from the policies of the Regional Council.

Council allowed irrigation to first comers until the water resource was over allocated.

Council by allowing irrigation increased the amount of discharges from the greater intensity of land use.

It seeks to protect polluters from firstly agriculture by slow decline of the highest discharging agricultural group Dairy, secondly industry and territorial authorities with no review of approved consents.

It then seeks to recover monitoring costs from those least able to shoulder those costs the smaller cash flow farmers having protected the bulk of Dairy by permitted activity status.

Council has shown no interest in allocating resources fairly.

I submit that the Council has failed to notify the plan change according to the requirements of the Act and is therefore invalid, Section 32_6 has not been complied with at the only venue I have visited, Rotorua Council office, where the Council advised the documents would be available.

Council chose for Nitrogen reference points the 2 years of low Dairy payout. These were years when leasing land was not a priority for dairy. Some support enterprises having neither inputs nor stock to calculate an Overseer amount are severely disadvantaged.

FEPs are not proposed to have uniform application certain agricultural industries have been singled out to be given unfair advantage.

FEPs are proposed to be provided by in Council approved staff, with internal Council approval and to standards defined by the CEO, this is clearly a judge jury executioner situation which is unconstitutional.

I wish Council to provide a balanced report that does not select only those results that favour its proposed actions and that important data is included in the report not hidden in references.

I wish Council to provide a rate of change that properly targets the persons or entities discharging the greatest amounts and concentrations.

I wish Council to make a more flexible Nitrogen reference point.

I wish Council to comply with its statutory responsibilities under the Act.

I wish Council to adopt an unbiased method of developing any FEP.

I wish Council to review the reports provided and make it clear when the TLG has overridden the

scientific quality of the reports.

I wish Council to provide some evidence of what the CSG was doing and when minority dissents were overruled.

I wish Council to report water quality and quantity entering and leaving each FMU.

I wish Council to ensure that all parts of the document are consistent. Land of >25degrees is both unusable and able to be used with mitigation in different parts of the plan change, clearly no one cross checked the whole document. A clear definition of slope measurement is needed.

I wish Council to ensure that co management with others does not result in additional processing time or cost and that applicants have a single point of contact.

I wish Council to increase the stocking rate from 6 to 10 per Ha for permitted activities.

I wish Council to adopt appropriate mitigations for the use of steep land not a blanket ban.

I wish to be heard at the meeting

I have detailed my reasons below with extracts from relevant documents.

I have focussed on my catchment as priority and moved to wider perspectives as time permitted. The amount of data to review precludes me from considering all the sub catchments in detail.

I own a farm in the Tahunaatara catchment .I have lived there since 1986.

I fenced most of my waterways in 1987 and planted riparian margins and shelter belt at the same time. They were replanted in better species a few years later. I have retired about nine hectares of my 35.4 hectares. I have a large wetland and stream mostly fenced off permanently some by vegetation and temporary fencing.

The farm is broadly a triangle. The high point is about in the middle at 357 m at the trig point and descends along a series of ridges and valleys to the stream at the South and Tahunaatara at the West and road at the north. The low points on the boundaries being about 320 to 310 m elevation. The stream at the South cuts into the pumice about half way along the boundary until it hits rock near the Tahunaatara forming a 3 m waterfall. There are two geological layers of pumice Tau 92 and 96 with varying texture from fine silt to coarse pebbles. There is a layer of impervious material about 320m and along the base of most ridges there are springs. It appears that most of the ridges capture rainfall into a perched aquifer and drain from these springs. This changes the likely composition of water, point discharges of urine are diluted making the springs available as fertigation or into wetlands on lower slopes, before joining the streams.

I operate on an all pasture regime. All standing pasture. Variable duration of rotational grazing. Pasture is herbal Ley with many species including several deep rooting erosion reducing ones.

I have never required any lessee to provide any N fertiliser. I use 10.5 tonnes RPR,1 tonne elemental sulphur and 1 tonne of potash at a rate of 500 kg per hectare per year .

I graze cattle, primarily Dairy replacements but have had had milking stock from 2002 -2012. I am currently grazing yearling heifers to calving. My experience shows that I can either

- winter 200 Cows for six weeks
- graze milking cows at 300 Cows for 11 one week rotations during the summer milking season
- graze yearlings at 75 / year.

Some intermediate periods are left fallow between changing from one regime to another.

My overseer nitrogen budget is 28 kg per Ha for dairy, and is 16 kg per Ha for yearlings.

Under the proposed rule change it appears that I may be unable to farm without a consent.

The cost of applying for a consent, preparing an FEP, paying for on going consent monitoring, from my very limited income, will make productive farming impossible. This appears to be exactly what Environment Waikato and the dairy industry wants.

Under the 1991 Resource Management Act sections 5 purpose & 7 other matters define the purpose of the Act. These sections detail how the act can be interpreted.

5 1 2 In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—

(a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and

(b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and

(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment

7(f)the act is to maintain and enhance the quality of the environment

The function of government is to prepare national policy

The function of territorial authority (regional council) is to implement the effects based legislation

What happened between 1991 and 2011.

Not much from national policy.

Not much from regional councils.

Now suddenly the Council is claiming that it is holding the line. I find the description of a bold initiative to be offensive as it is a statutory requirement not an initiative.

With reference to what happened with Variation 6 was a first come first served application, until the water resource was over allocated. I asked for a response to my question "does it apply to me" for a period of two years and was eventually told "these are permitted allocations" I refer below to the fact that irrigation water is a cause of intensification and hence increased discharge of pollutants.

Section 30 of the Act allows regional councils to allocate resources, but I assert that they must do so in a relation to sections five and seven, and that sustainable use for all the community was intended, not just the greedy and rapacious.

How much land was converted to dairy from forestry after 2000 one figure I've seen quoted is 15,000 hectares. Why is this relevant? there are effects from forestry on nitrogen loss which are much less than effects of dairy on nitrogen loss.

- Are any areas more important.

Recharge zones provide for water to enter an aquifer and then travel underground, from which abstractions are made. Discharges of contaminants near a river are going to affect a smaller area than those at high elevation catchment boundaries.

Resources' trading.

I oppose all resource trading as being a fallacy, allowing scam artists a means of profiting from fictional resources. If there is any trading it should be for a period of less than five years, non renewable, and to terminate should the owner of the resource sell the assets.

Quality of the information provided.

On 26th of October 2016 I went into Rotorua district council office at lunch time.

The plan change documents were not available. On 16 December I revisited the office and could find the plan change, overseer guide, pamphlet, but no copy of the section 32. A further visit on 14 Feb confirmed the lack of a section 32 report and its absence was verified with Council reception.

In a publication headed "general questions"
the third question

will stock by allowed on steep land

"if a property is over 20 hectares however, and has more than six stock units, no land over a 15° slope can only be cultivated or grazed unless there is a FEP detailing appropriate mitigation measures" Well that is a sentence that troubles any scholar of the English language, but in particular says that a farm of 20 hectares can have six stock units or 0.3 stock units per hectare. A dairy farm can have 28 stock unit as a permitted activity. Other documents advise it ought to have read 6 stock units per hectare.

As I don't seem to receive the 4 letters the Council says I should each year I put myself on the e mail list. The Dec 2016 webmail advised that meetings had been held in the first week of Dec and 2 more were happening on 7 and 8 Dec. I received this email on 15 Dec so how can I attend meetings that have already occurred.

Nitrogen benchmarking.

Hobson's choice on this which is bad for me and may well be bad for many others. My property was fallow during the period of the lower Dairy payout years, as lessees did not want to pay realistic rates, and I am having trouble persuading overseer to calculate a nitrogen discharge with no stock. I can calculate for 2002 to 2012 when I was Dairy milking platform, and from May 2016 onwards when I have been winter grazing and rearing yearling heifers to first calving. So for me the choice of dates makes my nitrogen reference point benchmarking so low as to mean I cannot farm.

Bureaucratic nonsense.

What is the function of a registration? I am in the rating system. It performs no useful function.

Why is it that a Farm Environment Plan (FEP) for dairy is good for a permitted activity, and an FEP from a non approved source is a controlled activity. Surely an FEP of the required standard would have the same consequences irrespective of industry approved or not. I understand an FEP needs to be to a certain standard but I do not see any reason for it to be only those approved by the CEO. Set the standards and accept FEPs meeting the standards, not a licence to fleece the community of \$4000 a property. With 5000 properties required to produce FEPs it makes a \$20 million dollar industry for a few consultants approved by the CEO, and a cost Doole seems to ignore.

If a dairy farm can farm as a permitted activity with a suitable FEP there is no justification for making any other Farmer apply for a resource consent if they have an FEP.

Part B of the s32 of the Plan talks about progressing on policies but gives no detail

Part C 2.2.2 gives a few meaningful figures

Dairy occupies 28 per cent of the land and dairy has increased its nitrogen leaching loss from 43% in 1972 to 63% in 2012 of total nitrogen leaching loss.

Part C2.2.4 reports

Nutrient loads	nitrogen	phosphorous
diffuse agriculture	61%	45%
point sources	7%	18%
natural sources	32%	37%

Now comparing 2.2.2 and 2.2.4 it appears that there is only 5% contribution of nitrogen from anything other than dairy, if all point sources are also dairy.

In the original report 2014/56 Table 5 quotes for the Upper Waikato FMU

Nutrient loads	nitrogen	phosphorous
diffuse agriculture	44%	26%
point sources	7%	10%
natural sources & Taupo	49%	64%

Since the NPS requires FMUs why are the data not presented as FMUs

Part C 2.2.7 mitigation

The details for this are sketchy and seem to be based on horticulture manuals that may not be transferrable to pastoral farming.

- 1 changes of use
- 2 changes in farming methods
- 3 riparian margin planting and bunds
- 4 point sources

Estimated cost

The table shows a \$13 million reduction in Dairy and \$2.3 million reduction in horticultural in reduced profits under plan change one and no cost to forestry or beef and sheep. The figures for fencing and water infrastructure in press releases clearly show major cost for beef and sheep farms. Also see above costs for FEP and if needed resource consent application and ongoing "monitoring" charges.

part D assessment

everything in part D starts with section 30.1.c There is nothing in this section that demonstrates any discussion of section 30.1.b which is about what other methods have been considered to achieve the objectives. The plan change assumes an objective and has only provided some reasons for its approach to the process of achieving that objective. It does not consider why this method is the best of a variety of means of because it has not deliberated on any alternative means of achieving the objective.

Part E entitled Provisions does contain some information purporting to be alternatives E2 discusses all now or staged. The staged option is to make a start. I remind the commissioners that the RMA Act required the Territorial Authority to maintain and enhance water quality in 1991.

E3

- 1 Business as usual with existing rules
- 2 Property limits for Phosphorus sediment E Coli
- 3 Modelled nitrogen discharge
- 4 Tax fertiliser
- 5 Catchment wide rules
- 6 Mandatory Plan, mitigations, no increase in N discharge for any farm, identify high dischargers of

N and reduce them quickly

Only 6 covers all the objectives so how can the TA seriously expect the public to agree that a range of options has been considered. 1,4,5 are catchment wide so do not use FMUs ie red herrings. 2,3 only address particular components of the discharges. And 6 with no FMU spacial reference is not much of an option either as I demonstrated in the 2.2.4 comments.

- what is the role of sediments in the hydro lakes in the storage of nutrients and periodical eutrophication events in dammed sections of the river?
- looking at the Fonterra Dairy NZ report, it is clear that long-term they see the only way of meeting standards, is to reduce stocking rates.
- to imply that fencing can be offset over a generation fails to recognise that it is an up front cost that can be recovered only in dribs and drabs. Finding what may be substantial Capital Investment may be uneconomic for many farmers.
- for the Tahunaatara catchment the proposed nitrogen values do not change over 80 years the reduction in nitrogen loss is nil.
- as an effects based Act prescribing fencing standards is unacceptable. Either stock are kept out or not. How it is done is up to the land holder.
- I have not found a scientific reference relating to the movement of nutrients on inclined land, recent press releases imply that behaviour of nutrients may not be as scientific inference concluded and that nitrous oxide may be lower on steep land.

There are issues with proportionality. On the face of it dairy has to reduce considerably more than others . In practice this is only going to happen over a very long period. My overseer calculation gives 16 kgHa⁻¹ N per year. An average dairy farm has 40 kgHa⁻¹ N for my catchment . At a reduction of 10% per decade the dairy will reduce by 4 kgHa⁻¹ per decade and take 50 years to reduce to 20 kgHa⁻¹ which will still be more than I discharge now. The CSG states 50% at 60 years which is even slower.

There are a number of things that the reports seem not to be saying. There has been what appears to be an agenda to follow a certain path and not consider other options.

2.2a table C1

	N tonnes	N kg/Ha	P tonnes
Tahunaatara	170	8.17	15.6
geothermal		9.27	
Wairakei	395.7		
Kinleith	145		
Te rapa Hamilton	200		73
Horotiu Ngaruawahia	98		16
Tuakau Pukekohe	51		22

For all these point sources protected by regionally significant infrastructure or industry their discharges are protected. So why are we picking on pastoral?

3454594 3.2.1 fig 3.1 a has no units nor has Fig 3.2a

3483783 There was clearly an opportunity in table 3 to show the relative nitrogen contributions of

other land uses that did not get reported.

Where is the information on discharge of N from indigenous vegetation?

In the summary the report states that Dairy farm conversions are offset by reductions in forestry and B&S farms. Is this by area, which would be valid, or by N leaching which would not.

3.2 Is a report by Niwa for Dairy Nz. on chlorophyll a.

“The key factors influencing phytoplankton growth in Lake Karapiro in summer have been identified as temperature, light, residence time, nutrient availability and draw-induced stratification”

“Nutrient availability will be affected by in-lake cycling and the isolation between bottom and surface water caused by stratification. It will also be supplemented by groundwater and stream inflows. However, nutrients from these inputs are likely to be largely removed by riparian and littoral vegetation, including aquatic macrophytes and the epiphytes growing on the macrophyte leaves.

In Lake Karapiro the growth and decay of the macrophyte hornwort (*Ceratophyllum demersum*) is likely to have an impact on phytoplankton nutrient availability. While the magnitude of this impact is currently unclear, the presence of extensive macrophyte beds in the lake, as well as frequent detachment and transport of plant mats further downstream due to changing flow patterns, means their effect is likely to be significant. “

So the causes of chlorophyll growth are several and that whilst nutrients need to be present, if river flows are higher then chlorophyll is less. The management of river flow volumes through lakes is clearly a mechanism that could be used to improve water quality , but receives no weight in the plan change.

3.3 This refers to the 2014/56 report 3306846 Where is the explanation of the variation of N in the river between 50 and 350 mg m⁻³ showing a clear annual cycle? If Vant reports reducing N during summer and Niwa reports mixed flow with no change in concentration other than in the stratified layer then did Vant only sample in the stratified layer?

Why is P concentration described as constant when it varies between 3 and 30 mg m⁻³, and is reported as a declining trend

3,5 3488633 reports P limiting growth in the river but advises that errors in the design of the experiment may make the data useless. Strained water lost chlorophyll and unstrained water contained macrophytes which eat chlorophyll. The scientists could not accurately weigh product to dilute in deionised water so leading to guessed impacts. A new experiment is needed that can accurately measure chlorophyll a.

2.4 sediment

The report indicates that the clearance of forest for pastoral farming may historically be the cause of sediment. It is not clear what effect if any under a steady state would be attributable to agriculture when 60% of all sediment is derived from stream bank erosion. The change of use in recent times from forestry to pastoral farming was clearly something that was able to have been prevented by the Council. The report states that sediment movement is triggered by storm events at an intensity of those expected with a return period of 1.5 years. Clearly this is a natural phenomenon and relates to geologically young erodible material on relatively steep slopes and with a level of rainfall that facilitates these erosion events. Quite how the plan change will have any impact on sediment load is murky at best. The report also suggests that riparian planting may result in the release of sediment currently entrained in stream bank vegetation ,as the shading effect smothers stream bank grass. When the model produced bank heights below water level they were arbitrarily changed to half a metre to avoid exposing the obviously ludicrous model.

How is slope to be determined? The Dairy Nz method of accessible to tractors is pragmatic and easily understood. The Fed Farmers struggled with 8 m contour data. Standing below the Horo Horo bluffs the area covered by 15 degrees extends for 1.4 km from the ridge edge using the nearest ridge as angle.

4.6 What is the best practice that is seen as the standard to aspire to ?

Riparian fencing

Low rate effluent application

Phosphorus lower application rates, RPR a slower release fertiliser, accurate spreading in suitable conditions

Stand off pads

Forestry

Farm plans

Why are people who have attained the bulk of these standards being targetted to shoulder a disproportionate burden of costs and achieve even tighter restrictions?

4.8 Doole economic model

No area allocated to miscellaneous Nitrogen

why is there

4769 4847 N load from forestry and

5139 5212 load of N from forestry?

where does load of N from geothermal figure in space allocation?

where is total hillslope sediment from both miscellaneous and forestry?

what is yellow substance attenuation?

4.10 Opus report E coli

It is not entirely clear if the point sources actually achieve tertiary levels but are quoted as municipal e coli 8.58×10^{14} at discharge per year

industrial e coli 2.17×10^{15} at discharge per year

as the national policy quotes e coli as per 100ml these figures are hardly helpful.

Hamilton municipal effluent is reported as 5,500 e coli per 100 ml or 10 times greater than the acceptable swimming limit and discharges about 2/3 of all municipal volume at 40000 m3 per day into the Waikato.

Affco horotiu has an AEE of 100,000 e coli per 100 ml at 5000 m3 per day

Kinleith is misreported as discharging 4.8×10^{13} e coli per year but actually discharges nil.

Under the plan change no point source has any increased control. Regionally significant infrastructure and industry can operate at filthy standards. Policies 10-13 of the plan change.

7.3 3469090 reports on e coli.

It shows 6 tests for 5 rivers. It lists cows sheep and avian, why not bovine ovine and birds? Hardly unbiassed. This report stumped me for a while. For several of the samples it had to be concluded that avian was a major contributor. For the mangawhero 4 of the 6 samples showed minimal ruminant contamination and only after rain was bovine and ovine contamination demonstrated. The median of the avian dominated results was 1230 mpn which is D grade without any stock influence. It became even more strange when suddenly another mass of data from Dairy nz was introduced. I could not find any of this data in an appendix. Quite how this was reported as findings by the scientists when it was 3rd party data from an affected party is baffling. I then perused table 9. I can find few words to describe how meaningless this table is. The final set of tables clearly incorporates the dairy nz figures. If it also incorporates the scientists findings is unclear. The scientists took

samples with and without rain so their sampling method was not random.

4.12 Scion reports for central north island

“Milk solids productivity increased by 60% (from 653 to 1,028 kg/ha) between 1990 and 2010 (Parliamentary Commissioner for the Environment, 2013). These productivity gains were achieved through increased stocking rates and increased use of inputs such as water, fertiliser and supplementary feed (Parliamentary Commissioner for the Environment, 2013; DairyNZ, 2015a, 2015b). Unfortunately, this production intensification has precipitated an array of negative environmental impacts including: a reduction in water quality; higher methane gas emissions; higher demands for surface and groundwater for irrigation; and reduced variety in pastoral landscapes (Baskaran et al., 2009). However, these environmental costs are largely not currently factored in to the prices charged for dairy products or internalised to dairy farm businesses. The corollary: the economic contribution of dairying to the New Zealand economy is overstated.

Units	Dairy	Forestry
Nitrogen ^{a,b} kg/ha/yr	15 – 115	3 – 28
Phosphorus ^a kg/ha/yr	0.30 – 1.70	0.01 – 0.10

In typical dairy farm systems, nitrate-leaching losses averaged approximately 65 kg/ha/year and ranged between 15 kg and 115 kg per ha per year. The carbon price in New Zealand was intended to be a signal of the impacts from GHG emissions to the economy but, in reality, it has been highly distorted. Reasons include: (1) the exclusion of some key emitting sectors, especially farming; (2) allowing the use of international units in the domestic market; and (3) the generous allocations of “free” NZUs to emission-intensive sectors (i.e. grandparenting) (Hood, 2013). Such price distortion has affected the emission/sequestration balance in a number of areas including the CNI, resulting in high rates of deforestation to provide land for conversion, in particular, to dairy farms. “

The authors separated absolute water demands into two categories: rainfall (green), and surface and groundwater (blue water). They concluded that contrary to the Canterbury region, the high annual rainfall in the Waikato region (1,260 mm) covered all the water needs in the representative group.

My reading of this is that variation 6 was an unnecessary waste of water resources.

5.3 3346619 reports conversions

2.13 The cost of land itself was excluded, as was the potential for any impact on land values resulting from the change in land use.

I don't see how a cost benefit analysis that excludes changes in capital value can be considered unbiased.

The report cultural value 5.4 aspires to swimmable and usable water for the length of the Waikato. Why has the report on arsenic in groundwater 2006/14 been avoided when Reporoa ground water fails the Drinking water standard (DWS) for a third of all wells. The only sample for Tahunaatara fails the drinking water standard but its level is lost in the other data .

Vant trends 2579392 table A1

Table A1: Average arsenic at ten Waikato River sites, April 2012 to March 2013. n = 12 in each case. Units are g/m³ the DWS is 0.01 using these units.

Site [As]

Taupo Gates	0.011
Ohaaki	0.027
Ohakuri	0.030
Whakamaru	0.028
Waipapa	0.026
Narrows	0.022
Horotiu	0.022
Huntly	0.017
Mercer	0.016
Tuakau	0.017

It is not clear if Wairakei is a major source of this arsenic or just natural geothermal activity. At no place does the Waikato meet the DWS.

The document 3351821 5.4 intrinsic values of rivers specifies fresh clean water for drinking. Why did no one tell them the water does not meet DWS from naturally derived contaminants?

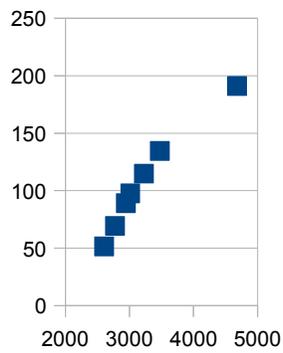
I have plotted the data for Tahunaatara as a chart and scatter graphs. When the data is properly reported the facts become abundantly clear.

Robert Steven Okell
1847 SH 30 RD1
Guthrie
Rotorua 3077

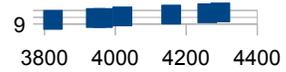
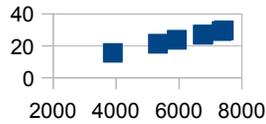
13 February 2017

Sheet1

	Dairy Ha	Dairy N	Forestry Ha	Forestry N	Native Ha	Native N
1972	2604	51.5	3895	15.6	4296	10.7
1982	2774	69.4	5337	21.3	4158	10.4
1992	2944	89.2	6779	27.1	4020	10.1
1996	3014	97.7	7356	29.4	3965	9.9
2002	3227	114.8	7424	29.7	3945	9.9
2008	3475	134.6	6755	27	3824	9.6
2012	4679	191.1	5937	23.8	4259	10.6
		kg/Ha				
1972		19.78		4.01		2.49
1992		30.3		4		2.51
2012		40.84		4.01		2.49



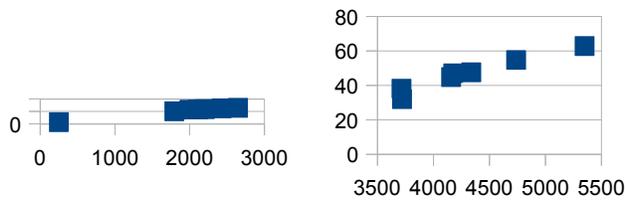
note water recharge to disch:
 so pollution from 1977 is bec
 hence load to come is signifi
 The 100 tonne increase from



Sheet1

B&S H Ha	B&S H N	B&S I Ha	B&S I N	N tonnes
2648	26	3721		32
2426	25	3715		38.2
2205	23.8	4158		44.8
2116	23.2	4338		47.6
1795	20.2	4176		47.1
1996	23.1	4738		54.8
248.6	2.9	5350		62.9
			kg/Ha	
	9.82			8.60
	10.79			10.77
	11.67			11.76

Large time for this catchment is about 40 years
 coming discharged now
 cant
 RMA to now was entirely avoidable and from Dairy



From: steveoakhill@vodafone.net.nz
To: [Healthy Rivers](#)
Subject: RE: submission on plan change 1 waikato catchments
Date: Thursday, February 16, 2017 8:20:14 AM

Hi Danica

I think that others tend to have a different focus to me on presenting what might appear to be similar issues so I think I prefer to speak for myself.

Bob

On 15/02/2017 14:21, Healthy Rivers wrote:

Hi Bob,

Thank you for your submission, we have received it and the format is readable.

I just need an answer to one last mandatory question -

• If others make a similar submission, will you consider presenting a joint case with them at the hearing?

Kind regards,

Danica

Danica de Lisle | Submissions Co-ordinator | Science and Strategy

Waikato Regional Council

DDI: 07 859 0835

Private Bag 3038, Waikato Mail Centre, Hamilton 3240

Please consider the environment before printing this email

From: steveoakhill@vodafone.net.nz [mailto:steveoakhill@vodafone.net.nz]
Sent: Wednesday, February 15, 2017 9:13 AM

To: Healthy Rivers

Subject: submission on plan change 1 waikato catchments

I append my submission to the plan change. please confirm receipt and that the format is readable.

Bob Okell

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