

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 my 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	: Te Aroha Federated Farmers	
Full address	: C/- 55 Seddon Road, RD3, Te Aroha, 3393	
Email	: ajmcgiven@clear.net.nz	Phone : 07 8844360 Fax : 07 8844361

ADDRESS FOR SERVICE OF SUBMITTER		
Full name	: Andrew McGiven	
Address for service of person making submission	: 55 Seddon Road, RD3, Te Aroha, 3393	
Email	: ajmcgiven@clear.net.nz	Phone : 07 8844360 Fax : 07 8844361

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

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.)

Te Aroha Federated Farmers Submission On Healthy Rivers Wai Ora Plan Change One

Te Aroha Federated Farmers is a district branch of Waikato Federated Farmers and represents approximately 200 farming businesses in the greater Te Aroha area.

Although our businesses are based in the Waihou and Piako river catchments, we have significant concerns around the proposed Healthy Rivers Plan Change One as the eastern river catchments will be next to be regulated and we wish for a practicable and sustainable outcome for all segments of our community.

Our submission will address four concerns that we have that currently surround the proposed plan.

1. Land Use Restrictions – Using a blanket approach to restricting land use change is incompatible with every farm having to establish a Farm Environment Plan (FEP), as this will be detrimental to land being utilized in an efficient manner environmentally, economically, and socially. We would like to see sub-catchments measured and monitored so that individual farms are better identified. Having to apply for a resource consent to change farming practise and/or system we believe is unnecessary and adds additional unnecessary costs to the farming business. Potentially valuable properties will be stuck in farming systems that are not beneficial to the land or the people, and the capital loss that some businesses may suffer will put severe financial constraints on any future investments. Farm technologies are constantly evolving and we believe that a land use restriction will place a barrier on further innovation that will adversely affect the way we produce food and feed our growing populations, both domestically and internationally.
2. Slope – While we agree that a three-meter buffer zone for 15-degree sloping land is a sensible provision we believe that this will make mechanical waterway maintenance of these water bodies extremely difficult and potentially hazardous. However, the 25-degree slope definition for “steep” land is extreme as this excludes a significant amount of productive farmland that has been successfully farmed in the past producing a large amount of revenue for our greater Waikato

communities. We do not want to see this land “retired” to the detriment of our smaller rural communities and forcing otherwise successful businesses out of their respective industries. There are already requirements from various regularity authorities and supply companies that ensure plantings and environmental standards are met. To suggest that this sloped land greater than 25-degrees should be “retired” will turn the Waikato into one large forest plantation with its increased fire risk.

3. Nitrogen – While the higher dischargers of Nitrogen need to be encouraged to reduce their leeching, under the proposed plan it appears that “grand-parenting” of these nutrient statuses will be enforced, severely inhibiting efficient production potential and again eroding capital value of land. Overseer is a modelling tool to estimate nutrient status and was never designed as a regulatory tool to monitor farmers and farming systems. It has been shown to have a +/-20% variation rate which we do not believe is accurate enough especially when livelihoods are at stake.
4. Urban/Rural – While farming activities have contributed to our current water concerns, there appears to be very little urgency with controlling and enforcing standards on urban council’s waste and storm water discharges. We believe that this plan should focus and encourage the entire community (which farmers are only a small part of) to improve and enhance water quality. The recent publicity around water pollution in Auckland’s beaches is a vivid example of how an entire segment of the community has been ignored. As rural rate-payers we do not expect to be also paying for urban based water pollution.
5. Social costs- We feel the impact from the implementation of the Healthy Rivers Wai Ora Plan include increasing stress levels on rural business owners, loss of employment opportunities, increasing financial burdens on already stretched businesses as well as the encroachment of the already fragile property rights that farm owners endure. The impacts of this plan on all community stakeholders will be too hard to swallow with expected job losses estimated at approximately 1000 and a loss in regional revenue estimated at \$1 billion.
6. E-Coli- While we agree that bovine e-coli is a major factor in river contaminants, we do not believe that it is the only factor. Avian, human, and other e-coli also makes up a major component in the river pollution and must also be addressed. It is also disturbing to note that there are also differing standards required countrywide, and would like to see a consistent measuring standard nationwide. It appears that the WRC is merely trying to prove itself by exceeding National Freshwater Policy Standards to the detriment of its regional stakeholders.

Under the current proposals, we believe that there is too much emphasis placed on the environmental standards, with the economic and social aspects ignored when all three of these considerations should be measured equally and we would not like to see these imbalances imposed on the Waihou/Piako catchments. It is still undetermined as whether these actions that farmers are required to undertake will provide the “desired” outcome about water quality that all stakeholders hope for.

We wish to be heard.

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 —: Andrew McGiven

Date —: 22/02/2017

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.