

**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

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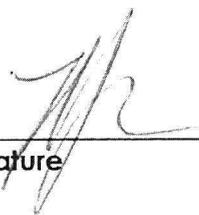
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I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

I wish to be heard in support of this submission.

If others make similar submissions, I would consider presenting a joint case with them at the hearing.

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Signature


date

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Introduction

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

We own a small block in the Middle Waikato Freshwater Management Unit. This property is located in the Mangaonua sub-catchment and initially we had horses as our majority livestock class, but we have over the last few years transitioned to cattle. All permanent waterways are fenced and we have been working on creating native and protected habitat areas (Kauri and other natives).

I also manage a mixed farming property (beef, sheep, grazing and currently maize) in the Middle Waikato Freshwater Management Unit. This property is located in the Waikato at Horotiu Br sub-catchment.

Stock are excluded from all waterways on this property and the management approach is to minimise cultivation (soil disturbance) to what is necessary and we have generally been conservative with the use of added nitrogen.

I support the principle outcomes outlined in the plan change for the catchment but submit on certain aspects below.

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The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following table. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan, including Objectives, Policies, or other rules, or restructuring of the Plan, or parts thereof, to give effect to the relief sought.

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
Objective 1, objective 2 and objective 4	I support with amendments	<p>The reasons for this are:</p> <p>Are the longterm water targets achievable and given the manmade changes which impede natural flow realistic.</p> <p>Can the community (especially smaller rural) survive to achieve targets.</p> <p>The plan in its current form (10yr) doesn't provide the certainty for longterm decisions to be made</p>	<p>Retain and amend these objectives to better reflect how the economic sustainability of smaller rural communities is to be achieved.</p> <p>The plan should clearly include how the freshwater objectives (if achievable) are to be achieved over the 80 year timeframe to provide certainty for land owners and communities as to their sustainability.</p>
<p>Nitrogen Reference Point Policy 2 and 7 Rules 3.11.5.2 to - 3.11.5.7(inclusive)</p> <p>Schedule B and all other areas in PC1 which refer to the Nitrogen Reference Point</p>	Oppose	The grandparenting and blanket approach to Nitrogen outputs is unfair to those who are low emitters, either through low use or environmental mitigations already instigated.	<p>Remove the use of a blanket Nitrogen Reference approach.</p> <p>Adopt a sub catchment methodology to addressing the environmental issues which are relevant to the farms within that catchment.</p> <p>Use Farm environmental plans to achieve this.</p>

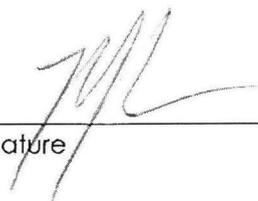
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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
			If an allocation methodology is required then utilise a natural capital approach on a subcatchment basis.
<p>Farm Environment Plans (FEP)</p> <p><i>Policy2, 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</i></p> <p><i>Schedule 1</i></p>	<p>Support with amendments</p>	<p>Farm Environment planning is the best approach to understanding issues within sub catchments and then the realistic ways to achieve positive outcomes.</p> <p>Have some concern with achievability of some timeframes and some standards.</p>	<p>Seek the amendment of FEP requirements to align with nationally recommended stock exclusion requirements.</p> <p>Mitigation requirements should be on a farm basis to manage critical source areas.</p> <p>Focus on reducing impacts from intensive practices rather than penalising extensive operations further.</p> <p>FEP submission timeframes should stand, but implementation timeframes need to be agreed between WRC and landowners depending on likelihood of measurable improvements and with consideration to financial impacts.</p> <p>Each FEP should align to achieve subcatchment objectives.</p>

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Yours sincerely

Tim Hale


Signature

8/3/17
Date