

Chief Executive  
401 Grey Street  
Private Bag 3038  
Waikato Mail Centre  
Hamilton, 3240

7<sup>th</sup> March 2017

Tirohanga Settlers and Sports Association  
c/-Pam Seymour  
113 Paerata Road  
RD1  
Atiamuri 3078

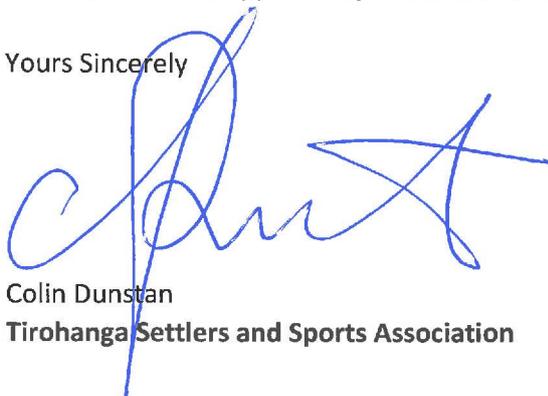
Dear Mr Payne,

Please find attached to this email a submission from the Tirohanga Settlers and Sports Association (TSSA) on Plan Change 1.

Tirohanga is a predominantly dairy and drystock farming area North West of Taupo in the Waipapa and Whakamaru tail race sub catchments. All residents in the area are members of the (TSSA) and support the submission. As chairperson I am authorised by the TSSA committee to make this submission on behalf of the members. Our community is made up of 100 households, a primary school and an early childhood education centre.

Thank you for the opportunity to make this submission.

Yours Sincerely

A handwritten signature in blue ink, appearing to read 'Colin Dunstan', with a large, stylized flourish extending from the end of the name.

Colin Dunstan  
**Tirohanga Settlers and Sports Association**

# 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	
<b>FOR OFFICE USE ONLY</b>			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

SUBMISSIONS CAN BE	
<b>Mailed to</b>	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
<b>Delivered to</b>	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
<b>Faxed to</b>	(07) 859 0998 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
<b>Emailed to</b>	<a href="mailto:healthyrivers@waikatoregion.govt.nz">healthyrivers@waikatoregion.govt.nz</a> <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>
<b>Online at</b>	<a href="http://www.waikatoregion.govt.nz/healthyrivers">www.waikatoregion.govt.nz/healthyrivers</a>
<b>We need to receive your submission by 5pm, 8 March 2017.</b>	

YOUR NAME AND CONTACT DETAILS		
Full name: Colin John Dunstan		
Full address: 217 Okama Road, RD 1 Atiamuri 3078		
Email: <a href="mailto:colin.dunstan@xtra.co.nz">colin.dunstan@xtra.co.nz</a>	Phone 0274758376	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name: Tirohanga Settlers and Sports Association		
Address for service of person making submission: The Secretary, 113 Paerata Road, RD 1 Atiamuri 3078		
Email: <a href="mailto:jaredandpam@yahoo.co.nz">jaredandpam@yahoo.co.nz</a>	Phone	Fax

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

**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.

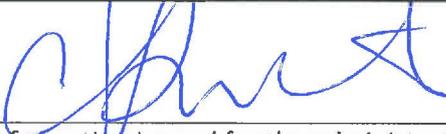
No, I have not attached extra sheets.

**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



Date

7.3.17

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
<b>Objective 1</b>	<b>Support</b>	<p>We support Objective 1 however we believe that the plan heavily targets nitrogen while phosphate is more or less ignored. Evidence suggest that phosphorus has a far greater impact on algae growth than nitrogen. “The phytoplankton in the Waikato river at the time of sampling tended to be P limited” (Dr Max Gibbs Report No. HR/TLG/2015-2016/3.5). We would like to know why Nitrogen has been so heavily targeted when compared to phosphorus. Because Phosphorus appears to have a far greater impact on algae growth we believe that Overseer may not be the best tool to use to help improve water quality.</p> <p>Also due to the hydro dams on the Waikato River it has become a very slow flowing river. This has led to an increase in algae growth.</p> <p>The government’s clean water accord appears to have super seeded the Council Plan Change. Our group supports central governments clean water accord. (90% of rivers and lakes swimmable by 2040).</p>	<p>There appears to be plenty of science completed on freshwater quality. However this needs to be presented in a way that can be followed by the communities in the catchment. The water quality targets also need to be much clearer and easy to understand. Phosphorus should be considered instead of Nitrogen and Overseer dropped or revamped to adequately measure this.</p>
<b>Objective 2; Social, economic and cultural wellbeing is maintained in the long term.</b>	<b>Support</b>	<p>We believe that the plan will not meet objective 2 in its current form. The impact of the plan will likely result in job losses (WRC council estimates 4958). A reduction of productivity will lead to rural communities to deteriorate. This will include but not be limited to school closures, poorer roading and other infrastructure, and have detrimental effects on mental health.</p>	<p>Alternatively a plan which has more flexibility in terms of time frame (short term 20 years, long term 100 years) may help alleviate some of these problems.</p>

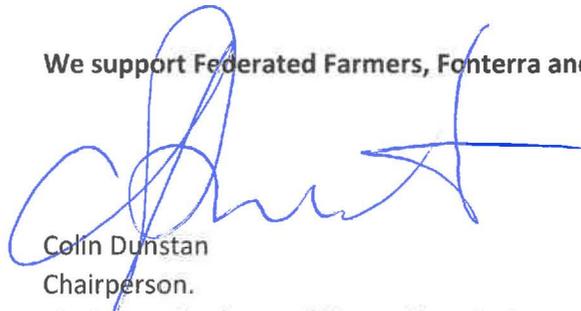
		<p>Environmental considerations and sustainability at a regional and national level has been specifically linked to farmer mental health, (Alison Goffin, ACC policy team, 2014). Has this been considered when making these plans? The level of anxiety caused about a perceived challenge to farmers out of their control can be difficult to deal with.</p> <p>For some farmers (mostly those younger farm owners) the cost to comply with the rules and the resultant loss in potential income could be enough to force them off the land. A reduction in productivity will lead to a reduction in income and a loss a jobs, this in turn will lead to increased rural to urban drift. There will be increase competition for jobs and housing in urban areas. Compounding this will be the reduced income on town business from reduced spending from the rural economy further exacerbating the problem. (Maxim Institute)</p> <p>This could also lead to a reduction in land values which would also negatively impact on the rateable value of rural properties.</p> <p>Potential buyers for farms in the future could be all corporate and foreign buyers as newcomers and single enterprise family farms are disadvantaged. Family farms tend to put more into a community than a corporate farm owner. Families owning land in a community tend to put themselves forward on school boards and other local committees. It is this involvement that keeps communities thriving.</p>	<p>Also setting the water quality standard to “wadeable” rather than “swimmable” as central government has recommended would be a much more realistic target.</p> <p>A plan where everyone is treated equally is fairer.</p>
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Section number of the Plan Change	Support /Oppose	Submission	Decision sought
<b>Objective 3:</b>	<b>Oppose</b>	<p>The reasons for objective 3 state that point source discharges are managed through existing resource consents and further action required to improve the quality of these discharges will occur on a case by case basis at the time of consent renewal. We believe this is unfair as it gives consent holders a lot more time to adapt to changes when compared with farmers. In some cases the consent holders may decide to cease to operate when their consent comes up for renewal moving their business to another area/country.</p> <p>If the plan forced consent holders to improve their PSD at the same rate as famers have to improve their diffuse discharge then the rate of improvement in water quality could be accelerated.</p> <p>Point source consent holders will not have to make reductions in pollutants until the expiry of their consent which may be for 25 years. This will mean that the benefit of the reductions made by diffuse source land uses may be captured by the point source consent holders.</p>	Point source consent holders must be required to make reductions in pollutants at the same rate and within the same time frame as diffuse source land users.
<b>Objective 5; Mana Tangata – protecting and restoring tangata whenua values. Specifically part b. new impediments to the flexibility of the use of tangata whenua ancestral lands are minimised.</b>	<b>Oppose</b>	<p>Why should Maori get special treatment and flexibility? The Treaty of Waitangi settlements process is the process for compensating and settling grievances. Local government has no role in this. If Maori are adversely affected by this plan because the governance structure for Maori land is unwieldy that is an issue for central government not Waikato Regional Council. Not only Maori land owners will be adversely affected by a lack of flexibility.</p> <p>Forest owners for instance who ironically make the least contribution to the river pollution problems will have practically no flexibility.</p>	A plan where everyone is treated equally is fairer. The plan and its rules must apply equally to all sectors otherwise it will be seen as inequitable and divisive.

		Young farmers who have bought farms with the intention of increasing production and hard work to improve their financial position will be severely affected.	
<b>Policy 4: Enabling activities with lower discharges to continue or to be established ...</b>	<b>Support/In part.</b>	How can activities which have a low Nitrogen discharge be permitted to be newly established. This will result in an increase in the overall Nitrogen loading. When the objectives are renewed in 10 years the nitrogen pool will be smaller, where is the nitrogen allowance going to come from.	
<b>Policy 6.</b>	<b>Support/In part.</b>	How is it possible some enterprises are continuing forestry to pasture conversion, (in some cases dairy) under a Certificate of Compliance umbrella?	Cancel certificate of compliance.
<b>Policy 6, 7, and 16.</b>	<b>Oppose</b>	All to the benefit of Maori.	If Maori were treated the same under the plan then the goals could be achieved more quickly.
<b>Policy 7: Preparing for allocation in the future.</b>	<b>Oppose</b>	Policy 7 is unclear. What is meant by future allocation decisions?	Any future activity that could affect the four contaminants of the river should be publicly notified.
<b>Policy 9 d.</b>	<b>Oppose</b>	Multiple farms owned under the same ownership structure are capable of trading Nitrogen under the enterprise rule yet a single farm owner can't do that.	
<b>Policy 10: Provide for point source discharges of regional significance.</b>	<b>Oppose</b>	The Kinleith Pulp mill contributes 15% of the total loading of both phosphorus and nitrogen entering the Waipapa Lake. While not specific the policy will presumably allow this pollution to continue. The policy will also allow failing sewage schemes to continue unaffected. This is inequitable and divisive.	All polluters and all sectors must contribute equally to reducing pollution and the costs of improvements and reductions must be borne by those causing the problem. Some provision should be made for the treatment and proper

		<p>Why will some regional infrastructure and industry be exempt? Everyone, urban and rural should be contributing. The cost should fall where the costs lie, i.e. urban people should be paying for the upgrade of their wastewater treatment systems to meet the new regulations in the same time frame as farmers. Raw sewage continues to be discharge into water sources throughout the region without any consequence. This would be unacceptable for a dairy farm but seems acceptable for urban effluent. This should be stopped immediately without exception. These policies apply to diffuse source activities. What process and rules will be used to assess and allow/disallow the establishment or expansion of point source discharges? The expansion of sewerage schemes due to population growth for example. What limitations will be applied to the establishment of a new large point source polluter? Will this require further reductions by diffuse source operations because of the increased total load in the river? This would be totally inequitable.</p>	<p>disposal of runoff from gutters/streets. These discharges must have a negative impact on sediment and e-coli in freshwater.</p>
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**We support Federated Farmers, Fonterra and Beef and Lamb submissions.**



Colin Dunstan  
Chairperson.

**Tirohanga Settlers and Sports Association.**