

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

**To:** Waikato Regional Council  
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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.

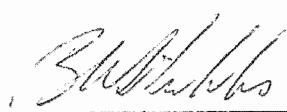
**I wish to be heard in support of this submission.**

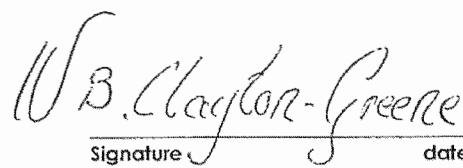
**If others make similar submissions, I would consider presenting a joint case with them at the hearing.**

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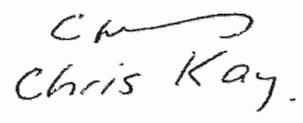
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Signature date

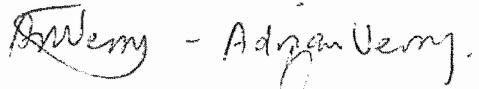
 2/3/17.  
Signature date

2-3-17

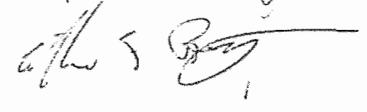
  
Chris Kay.

  
John K. Pish.



  
Adrian Verry.

Kylie Barnes 



## WAIKATO REGIONAL COUNCIL PROPOSED REGIONAL PLAN CHANGE 1- WAIKATO AND WAIPA RIVER CATCHMENTS

### Introduction:

Thank you for the opportunity to submit on the Waikato Regional Council's proposed Plan Change 1.

The Waitomo Catchment Trust is a small voluntary, not-for-profit organization formed in 1992 to address catchment issues that threatened the effective and sustainable operation of a multimillion dollar tourism operation focused on the Waitomo Glowworm Cave.

The Waitomo catchment is approximately 50 sq. km. in size containing two major sub-catchments. Rather than having one major stream and broad valley exit, the entire runoff from the catchment is confined to a "plug hole"-the Glowworm Cave.

The seed for our organization was sown in the 80s when the then Tourist Hotel Corporation liaised with the Waikato Valley Authority to try to address the issues of sedimentation being encountered in the main glowworm grotto. The goals were to-

- Attenuate flood peaks
- Reduce erosion, and
- Improve the stream ecosystem in general

The government paid for 2/3 of the scheme and a modest amount was invested before the scheme expired in 1982, with very limited success.

Early in the 90s, building on the ethic of "sustainable landcare" that was being promoted nationally, local Hapu and DOC (joint owners of the cave) approached the Regional Council about catchment protection. The result was to adopt a "grass roots" approach where local organisations and entities would work hand-in-hand with the Council to work out local issues.

Support came from-

- The farming community
- Tourism operators
- Iwi
- DOC
- The District Council
- The Regional Council
- QE II Trust
- Native Forest Restoration Trust
- Recreational cavers, and
- Tramping clubs

Such a broad support was engendered by homing in on win-win outcomes, where everyone could see the sense in embracing the economies of balancing effective farm management with environmental and aesthetic enhancement.

A considerable amount of capital work has been carried out using Property Protection Plans with a broad base of financial contribution. Sediment levels have dropped, resulting in a decrease in de-silting in the Glowworm Cave and less flocculation at the local water

treatment plant. Recent fresh water invertebrate studies also indicate that the stream 'health' has improved.

Farmers talk in terms of fewer stock losses and easier stock management, less fertiliser, focusing more on productive land whilst retiring unsuitable land and an improved aesthetic to their property.

A critical tool for land management within the catchments has been the Property Protection Plan (Farm Environment Plan (FEP)). Our experience was to have these plans produced by the Regional Council, in consultation with the landowner. This resulted in a better understanding by the landowner of the parameters of their property but not at a cost to them. (an effective "carrot")

Challenges that remain are:

1. The affordability and apportionment of costs associated with on-going maintenance of fencing.
2. Establishing low impact harvesting guidelines and methods for exotic plantation blocks.
3. On-going monitoring to gauge the effectiveness of initiatives and to detect any adverse change.

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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	REASON	RELIEF SOUGHT
<p><i>Schedule 1</i></p> <p><i>Page 51</i></p> <p><i>Farm Environment Plans</i></p>	<p>We support with amendments.</p>	<p>The reasons for this is:</p> <p>Disagree with the current nitrogen reference point rules.</p> <p>Believe there should be funding available or professional help available free of charge to the landowner to complete FEP's</p>	<p>As an alternative we Propose:</p> <p>Nitrogen Reference points be calculated as part of the FEP at an individual property level or sub catchment level.</p> <p>If it is to be calculated on a percentile basis (even at a sub catchment level) it should be based on a 5 year average.</p> <p>Collaboration is an imperative dynamic in the production of an FEP. WRC staff has the ability to provide a degree continuity. Certified Farm Environment Planners??</p> <p>FEP production comes at a cost. A strong incentive for landowners could be established if this was a free or subsidized service.</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:
Schedule 1 (cont'd) FEP's			In our Trust's experience, Property Protection Plans were produced by WRC field officers at no cost to the landowner, resulting in 100% buy-in, strong relationship building and a productive education process for both parties.
<p><i>Schedule B</i></p> <p><i>Nitrogen Reference Point</i></p> <p>Page 47</p>	<p>We support with amendments:</p>	<p>The reasons for this is:</p> <p>We support the use of nitrogen reference points for individual properties but again disagree with the process being suggested to arrive at these points.</p>	<p>As an alternative we propose:</p> <p>Nitrogen reference points should be calculated on an individual property basis or on a sub catchment basis. Not on a whole Waipa/Waikoto catchment basis. NRP's should be part of the individual farmers FEP as suggested.</p> <p>If grand parenting is to be used it should be measured at least on a 5 year basis.</p> <p>The highest emitters should be made to reduce to below 75% perhaps down to the 60% mark. But very low historical emitters should have the ability to move up to a higher level, perhaps to 30%. This would lower emissions overall but allow under developed farms to reach their potential. Including undeveloped Maori land.</p> <p>We also believe Farmers who have shown a dedication in the past to</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:
<p><i>Schedule B(cont'd)</i></p> <p><i>Nitrogen Reference Point</i></p>			<p>Improve water quality and emissions of not only Nitrogen but Phosphorus, sediment and pathogens by way of fencing waterways, retiring erosion prone land and changing land use, as many of us have done in the Waitomo Catchment scheme, should have this taken into account when calculating our NRP's on our FEP's. Most of this work was completed well before 2014-16.</p>
<p><i>Schedule C</i></p> <p><i>Stock exclusion</i></p> <p><i>Page 50</i></p>	<p>We support with amendments:</p>	<p>The reason for this is:</p> <p>We support the concept of stock exclusion from our waterways in most cases. However the sheer enormity of the task at hand and complex nature of individual properties and the huge financial burden of this means the proposed rules around it are far too stringent in the time frames allowed and would lead to inabilities for some farmers to even come close to complying.</p>	<p>We seek that the provision is amended as set out below:</p> <p>As an alternative we propose: Most waterways, wetlands and lakes are reasonably well known to Waikato Regional Council Staff.</p> <p>We suggest that these are prioritised and that there is a sensible staggered approach to the fencing of these. The larger and/or more polluted of these should be targeted first with a sensible time frame (5 years) for the first stage. Then working further into the next prioritised for the next 5 years.</p> <p>We( the farmers, IwL D.O.C and tourist operators within the Waitomo Catchment) have a strong knowledge</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:
<p><i>Schedule C (cont'd)</i></p>		<p>of the costs and time frames which this sort of undertaking has. As does the WRC staff that have been part of our scheme. It takes years for plans to be made, materials to be paid for, fencers to be available in suitable weather conditions, earthworks to prepare fence lines. Are earthworks to prepare fence lines even appropriate? At times the source of erosion in itself. Also try finding a fencer these days who is willing to dig post holes by hand. Some of the steep land proposed cannot be accessed by regular vehicles even.</p> <p>Then there is the alternative water supplies needed. Another huge cost for the farmer concerned. We cannot ask for the impossible.</p> <p>The rules around what constitutes a waterway also need to be amended. This would also be clarified within the prioritisation type system.</p> <p>Once these riparian areas have been established, they in effect become a national asset in that they are no longer of any use to the farmer financially, but will continue to need maintenance in the form of weed control and fencing</p>

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The specific provisions my submission relates to are:	My submission is that:	The decision I would like the Walkato Regional Council to make is:
<i>Schedule C (cont'd)</i>		<p>Maintenance. As we have discovered in the Waitomo Catchment, this ongoing burden and eventual replacement of old fences after 30-40 years can be enormous.</p> <p>Therefore current funding and subsidies must continue for all new riparian and erosion prone land fencing, maintenance and alternative water systems, whether it be made compulsory or not. We could not have achieved what we have here at Waitomo without that funding. If you want results it is imperative that the funding is maintained. Without it you will seriously impair the progress of the Plan change.</p>
<p><i>Policy6</i></p> <p><i>Rule 3.11.5.7</i></p> <p><i>Page45</i></p>	<p>We oppose this rule:</p> <p>The reason for this is:</p> <p>This would in effect completely remove the ability for a farm to change the type of farming it operates. Even if individual topography and other factors may well make it quite suitable to do so.</p> <p>This may have significant financial impacts immediately on such farms due to their market value and therefore their financial arrangements could be significantly impaired.</p>	<p>As an alternative we would like to see:</p> <p>This rule be completely removed and the Farm Environment Plan be used as the measures to make decisions on land use changes. (we have submitted previously on the LEP's)</p> <p>If other measures have been undertaken and shown a history of low outputs of contaminants, there should be the ability for a farm to increase it's</p>

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WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 • WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:	The decision I would like the Waikato Regional Council to make is:
<i>Policy 6(cont'd)</i>		<p>Production to offset rising costs and for the good of the economy.</p> <p>Some farms may well have already retired less desirable areas of land, therefore reducing their emissions. This should be recognised when they apply for land use change. A resource consent may be required but the flexibility must remain.</p> <p>A word on cropping: We understand the importance of intensive cropping being restricted in some ways eg: slope angles, riparian margins, seasonal differences. But the blanket approach to this subject needs to be amended. Again individual circumstances should be included. There are so many different types of soils and topography out there. Our land in the Waitomo Catchment is</p>

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 WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:	The decision I would like the Waikato Regional Council to make is:
<p>Objective 3:                      Short-term improvement in water quality....                      Pg 27</p> <p>Rule 3.11.5.4                      Controlled Activity Rule –                      Pg 42                      Matters of control -                      Pg 43</p>	<p>Over the last 30 years, a new multi-million dollar industry has been established in Sub-catchment 52 – Waitomo Stm. Tumutumu Road. This is Adventure Cave Tourism, in particular cave rafting or tubing (often referred to as black water rafting). This internationally popular activity places its clients in recreational contact with local cave stream ways.</p> <p>This industry employs a large number of skilled people and contributes a significant amount to potential income-earning opportunities in other parts of our District and Region. In recognition of the need for high water quality, a successful application was made to have specific streams in the Waitomo catchment designated as “<b>Contact Recreation</b>” waterways.</p> <p>High water quality is an imperative in this situation and the given time frames to reduce microbial pathogens (<i>E. coli</i>) would pose a huge risk to the industry. The MfE sets the safe upper limit for Contact Recreation in fresh water at 540 <i>E. Colii</i> 100ml., which is the 80-year target.</p> <p>Research tells us that it is very difficult to mitigate <i>E. coli</i> though stock exclusion and riparian planting and that probably the most effective method is to distance the activity well away from the point source. This is often not a choice.</p> <p>We believe strongly that “<b>edge of field mitigation</b>” measures would be extremely effective and should be strongly promoted along with stock exclusion from waterways, riparian planting and <b>Farm Environment Plans</b> that are cooperatively prepared with landowners..</p>	<p>All inputs to <b>Contact Recreation</b> streams should be regarded as point inputs and monitored as such, on a case-by-case basis.</p> <p>Grazing of crops adjacent to waterways and grazing of unacceptably steep contour by heavy stock should be at the very least regarded as a <b>Controlled Activity</b> and deemed a <b>Restricted Discretionary Activity</b> where necessary.</p> <p><b>Edge of field mitigation</b> should be widely promoted on farms bordering Contact Recreation streams</p> <p>We agree that the WRC should exercise control over the actions and timeframes for undertaking mitigation actions to maintain or reduce the diffuse discharge of microbial pathogens to water.....” (3.11.5.4 ii) and that they should provide the “Tools for measuring or modeling discharges from individual properties.....” (3.11.4.7 b iii)</p> <p>Robust, regular monitoring (as well as risk assessment and auditing) will be mandatory where consented activities take place.</p>
<p>Rule 3.11.5.2                      Permitted Activity Rule –                      Page 40                      Schedule C – Stock exclusion                      Pg 50</p>	<p>Is 4 e ii (pg 40) “.....cannot be within three metres of a bed of the water body...” consistent with                      Schedule C 2. (pg 50) “...cannot be within one metre of the bed of the water body...”</p>	

Yours sincerely: Mark. Frederikson and John Ash (on behalf of the Waitomo Catchment Trust Board)

We would like to be heard.



5/3/17

Signature  
Mark Frederikson

Date



Signature  
John Ash

5/3/17  
Date