

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 _____ William Cuttance		
Full address _____ 711 Belcher Street, Pirongia		
Email _____ William.cuttance@vetent.co.nz	Phone _____ 027 4755582	Fax _____

ADDRESS FOR SERVICE OF SUBMITTER		
Full name _____ William Cuttance		
Address for service of person making submission 711 Belcher Street, Pirongia _____		
Email _____ William.cuttance@vetent.co.nz	Phone _____ 027 4755582	Fax _____

TRADE COMPETITION AND ADVERSE EFFECTS (select appropriate)
<input type="checkbox"/> I could / <input checked="" type="checkbox"/> could not gain an advantage in trade competition through this submission.
<input type="checkbox"/> I am / <input checked="" 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.

[I am a veterinarian and farm management consultant, servicing clients in the Waikato region.](#)

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.)*

3.11.2 Objective 1, Page 27

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.)*

On page 15 it is stated that: “Based on the information currently available, the CSG has concluded full achievement of the Vision and Strategy by 2096 is likely to be costly and difficult. The 80-year timeframe recognises the ‘innovation gap’ that means full achievement of water quality requires technologies or practices that are not yet available or economically feasible. In addition, the current understanding is that achieving water quality restoration requires a considerable amount of land to be changed from land uses with moderate and high intensity of discharges to land use with lower discharges (e.g. through reforestation).”

These statements are in conflict with the vision on page 20 which reads: “Our vision is for a future where a healthy Waikato River sustains abundant life and prosperous communities who, in turn, are all responsible for restoring and protecting the health and wellbeing of the Waikato River, and all it embraces, for generations to come.” Requiring a “considerable amount of land to be changed to land use with lower discharges (e.g. through reforestation)” is most likely going to involve a significant reduction in the both the capital value of that land and the income generated off that land. This is not consistent with “prosperous communities”.

Current landowners need certainty that any mitigation strategies embarked on to comply with Plan Change 1 will not affect their businesses in the long term and will comply with future plan changes. As an example, complying with the stock exclusion rules in Plan Change 1 will involve significant costs. These actions may be in vain if future plan changes mean that “a considerable amount of land” is no longer able to be grazed by farmed animals.

Objective 1 is unachievable in its current form without significantly affecting the lives of everyone in the Waikato community and wider New Zealand. Without a strong livestock farming industry forming the backbone of the community there will not be “prosperous communities” in the future.

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:

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.)*

3.11.2 Objectives 1 and 3, Page 27

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

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The objectives require reaching targets for water quality attributes. However, as stated on page 15: "...the effect of actions put in place to reduce nitrogen now may not be seen in the water for some time (the length of time lag varies across the catchment...)". "Some time" is not well defined, nor can it be measured with any degree of accuracy. Therefore, although mitigation strategies can be put in place based on current knowledge the impact of these strategies on water quality attributes is near impossible to predict, especially for nitrogen. What will be gained from implementation of mitigation strategies if it is shown that there has not been a corresponding improvement in water quality, due to the time lag?

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
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Amend as follows: Incorporate into the objectives that there is uncertainty in predicting how water quality attributes will change over time.

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(continue on separate sheet(s) if necessary.)*

3.11.3 Policy 2. a. Page 30

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I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

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- Support the above provisions
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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.)*

A risk-based approach to mitigating discharges at the farm level through a Farm Environment Plan should result in changes that benefit water quality. These changes will need to be practical and achievable on the individual farm.

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*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.)*

3.11.3 Policy 2. c. Page 30 and Schedule B page 47

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Establishing a nitrogen reference point should not be required if the Farm Environment Plan is comprehensive as those farms where there is a risk of nitrogen losses it will be identified and targeted mitigation with associated timeframes will become part of the Farm Environment Plan.

The method outlined for calculating a nitrogen reference point is based on modelling the losses within a specified date range in OVERSEER. However, OVERSEER was designed as an annual average model and should not be used to model nutrient losses in any particular year as the inputs should be on an annual average basis rather than specific to a certain calendar year.

The requirement to establish a nitrogen reference point should be removed from all parts of Plan Change 1.

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3.11.3 Policy 2 e. Page 30

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MY SUBMISSION IS THAT

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Requiring stock exclusion within 3 years of a Farm Environment Plan is likely to impose significant cost on farming businesses and may not be achievable in some circumstances. In some cases, the available resources and labour may be the limiting factors.

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Amend as follows: Change the required timeframe to be tailored to the individual farm risk situation. The timeframe for stock exclusion should be detailed in the Farm Environment Plan and take into account the capital expenditure required, significance of the waterway and any likely benefits to the environment.

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(continue on separate sheet(s) if necessary.)*

3.11.3 Policy 9

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

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A sub-catchment approach appears to be a better fit with achieving the vision for the Waikato River. Alongside Farm Environment Plans a sub-catchment approach will drive change based on the risks to water quality specific to each sub-catchment and should promote engagement with the wider sub-catchment community.

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Amend as follows:

PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

<input checked="" type="checkbox"/> I wish to speak at the hearing in support of my submissions.
<input type="checkbox"/> I do not wish to speak at the hearing in support of my submissions.

JOINT SUBMISSIONS
<input checked="" type="checkbox"/> 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	
<input type="checkbox"/> Yes, I have attached extra sheets.	<input checked="" type="checkbox"/> No, I have not attached extra sheets.

SIGNATURE OF SUBMITTER <i>(or person authorised to sign on behalf of submitter)</i> <i>A signature is not required if you make your submission by electronic means.</i>	
Signature	Date <u>08/03/2017</u>
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.