

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

**Submission Form**

Submission on a publicly notified proposed Regional Plan prepared under the Resource Management Act 1991.

**On:** The Waikato Regional Council's 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 present a similar submission I will consider presenting a joint case with them at the hearing.**

Denzil Anselmi 08/03/2017

**Name**

**date**

**WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 – WAIKATO AND WAIPA RIVER CATCHMENTS**

The specific provisions that my submission relates to are:

<p><i>Objective 2 – Social, economic and cultural wellbeing is maintained in the long term</i></p>	<p>I support this objective.</p> <p>The reason for this is that I believe the positive wellbeing of the Waikato community is an important outcome of the plan. However, I believe that on page 28 '<i>Reasons for adopting Objective 2</i>' the council admit that the plan will not achieve this objective in its current state. The plan says that to achieve the targeted water quality standards, there may be a significant departure from how businesses and communities currently function. This should not be accepted as a suitable outcome.</p>	<p>I seek that the provision is retained as proposed, but propose that there should be more modelling on the social and economic costs of the plan, and that the plan is not actioned until the Waikato community have been informed of the likely outcome and are in support of it.</p>
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<p><i>Rule 3.11.5.4 – Matters of Control, iii.</i></p> <p>Diffuse discharge of nitrogen does not increase beyond the properties Nitrogen Reference Point.</p>	<p>I oppose this provision.</p> <p>The reasons for this are that the rule does not allow flexibility in the management of the property, nor does it allow it to adapt to markets. Case studies have shown that keeping lambs on farm longer to capitalise on higher meat schedule prices may put a farm over their Nitrogen Reference Point. This will limit a farm’s income, profitability, viability, and the farmers’ ability to make necessary changes from season to season. It is an impractical rule. It may also reduce farm values as a property has less ability for improvement and intensification. Low N leaching property owners are being penalised instead of high loss farms.</p>	<p>I seek that this provision is amended.</p> <p>As an alternative I propose an allocation that can be applied for and given out to the lowest certain percentage (e.g. Lowest 25%) of properties in terms of Nitrogen Reference Point so long as they meet their obligations under the best management practices identified in the Farm Environment Plan.</p> <p>And that property owners can trade (sell) some of their nutrient loss allowance to farmers within the same catchment.</p>
<p><i>Schedule B – f</i></p> <p>The reference period is the two financial years covering 2014/2015 and 2015/2016</p>	<p>I oppose this provision.</p> <p>Few farmers were using “normal” inputs during these two seasons (many had cut stocking rate and feed and fertiliser inputs) and so limiting them to these two years is unfair.</p>	<p>I seek to have this provision amended.</p> <p>I propose that any year out of the previous five seasons be used, to align with <i>Rule 3.11.5.4, Matters of Control, iii</i> which states a 5 year rolling average annual nitrogen loss be used to compare to the enterprise’s Nitrogen Reference Point.</p>

<p><i>Rule 3.11.5.7 – Land Use Change</i></p>	<p>I oppose this provision.</p> <p>This rule will reduce land values. It will also put financial pressure on property owners who have bought a property containing pine tree plantations. They have paid for the property based around the area being able to be used as productive farmland. With this rule, their land values will go down, and this will reduce equity. Some will come under pressure from the bank and may lose their farm. They can be granted a consent but it is almost impossible for a new land use to have a lower loss of contaminants while being financially viable. This is not a sustainable outcome from the plan.</p>	<p>I seek that this provision is deleted in its entirety.</p>
<p><i>3.11.4.3 – Farm Environment Plans</i></p>	<p>I oppose this provision.</p> <p>I believe that property owners should be able to prepare their own Farm Environment Plans as they know their land best. It will add significant cost to an enterprise to become compliant if it has to be prepared by a certified person (\$3000 or more for a consultant's time).</p>	<p>I seek that this provision be amended.</p> <p>I propose that a Farm Environment Plan can be prepared by any person, but must be approved by a person with appropriate certification.</p>

<p><i>Policy 16 – Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Maori land.</i></p>	<p>I oppose this provision.</p> <p>Maori land should be allowed no more flexibility of development than land owned by any other person/persons. In the values, there is emphasis placed on the cultural significance of the river health to Maori. Yet they wish to develop land which will add to the nutrient load of the river, and ultimately it will be compensated for by another person or everyone else in the Waikato river catchment.</p>	<p>I seek this provision be deleted in its entirety and Maori land be treated with the same consideration as other land for granting of consents.</p> <p>I also seek that <i>sub clause b</i> under <i>Policy 7</i> be removed as it relates directly to <i>Policy 16</i>.</p>
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**Signature:** Denzil Peter Anselmi

**Date:** 8<sup>th</sup> March 2017