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7/3/17

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 ***Please Note:*** *if you fax your submission, please post or deliver a copy to one of the above addresses*
Emailed to	healthyrivers@waikatoregion.govt.nz ***Please Note:*** *Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.*
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	Trinity Lands ltd Andrew Archer and Ian Elliott	
Full address	10 Neal st Putaruru 3443	
Email andrewa@trinitylands .co.nz	Phone 0272022371	Fax 078838645

ADDRESS FOR SERVICE OF SUBMITTER		
Full name	Andrew Archer	
Address for service of person making submission	153 ARMADALE RD RD1 Te Aroha	
Email andrewa@trinitylands.co.nz	Phone 0272022371	Fax 078838645

TRADE COMPETITION AND ADVERSE EFFECTS *(select appropriate)*

☐ ~~I could~~ / ☒ could not gain an advantage in trade competition through this submission.

☐ I am / ☐ 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.

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We represent 30 dairy farms in the South waikato district that are directly affected by the proposed plan . The Farms that this submission represents produce on average 100 million export dollars for New Zealand per annum

We support the improvement of Waikato river systems in a balanced manner and believe this can be achieved by continuing education and improvements in industry practices that minimise the impact on the river system and considers how all sectors of the community can help maintain a healthy river system We oppose general regulation to achieve these outcomes

We consider that the Waikato river and its tributaries are generally in good health where they run through farm land, but this should at least be maintained or slowly improved over time, we also see from the data presented by WRC that point discharges from urban areas and specific geothermal activity are of far greater concern to the health of the river system . Secondly the hydro –electrical Dam system has a far greater impact on the health of the river system but this is ignored in this plan change, the build-up of geothermal derived natural arsenic behind the dam walls is of significant concern to us, Why are the hydro – electric companies allowed to ingore this?

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)

Objective 1

80 year water quality targets in Table 3.11-1

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

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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)

The targets for water quality set out in table 3.11-1 while being aspirational, are unrealistic without placing a huge burden on the social and economic outcomes as outlined in WRC senerio reports

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:

We propose that these water quality attributes be modified to internationally acceptable levels

Ecoli 95% less than 1000/100ml

Nitrate Annual medium less 2 mg/litre

Water quality clarity at 1 metre at times of annual return low flow

Phosphorus less 20mg / 1000 litres

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 ——Andrew Archer and Ian Elliott	Date 1st March 2017
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.

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Additional sheet to assist in making a submission

Section number of the Plan Change	Support /Oppose	Submission	Decision sought
Please refer to title and page numbers used in the plan change document	Indicate whether you support or oppose the provision.	State in summary the nature of your submission and the reasons for it.	State clearly the decision and/or suggested changes you want Council to make on the provision.
Objectives 3.11.2 Objective 2	Support with amendment Oppose in part	Objective 2 social and economic outcomes are being ignored for small rural communities such as Putaruru and Tokoroa Senerio 1 Integrated assessment modelling shows severe social and economic impacts that particularly hit the lower socio-economic profile in the above communities Objective 2 does not place enough weight on maintaining the economic and social well-being of the people in the region but rather concentrates on the environmental and cultural outcomes and section 32 report gives little or no analysis of how the economic and social prosperity of the community is going to be maintained by PC1	Send the council back to come up with a balanced plan that protects both the river and the socio-economic viability of the regional communities as required under the RMA Consider Senerio 3 as a more acceptable solution for balancing people , economy and environment That Senerio 3 be analysed and considered as a more balanced approach for achieving the requirements of the NPS –FW and fulfilling the fundamental requirement of the RMA to equally weight the outcomes for Environmental Economic and Social consequences of this proposal That table 3.11-1 be revised to what is achievable under Scenario 3
Objective 4	Oppose	Objective 4 (b) is no better than the allergy of slowly killing a Crayfish by placing it in a pot of cold water and slowly bringing it to the boil, a death by a thousand cuts is still death, I want to see a long term plan that considers the primary land based industry as an essential and vibrant part of the region, not killed off by well meaning idealists.	Send the committee back to come up with a plan that sees this generation and the next with a future in primary production and growing food for ourselves and the world in a sustainable manner and that considers agriculture as an essential part of our national prosperity as it is today. Remove objective 4(b)

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Policy 1	Support with amendment	Allow continued moderate nutrient discharges from farming	Strike out '~~moderate to~~' in Policy 1 (b)
Policy 2	Support	A good way forward by permitted activity rather than consent Educate and make ways for business to improve without regulation	
Policy 3 (b)	Oppose	Capping commercial vegetable production is an ill-conceived thing to do. An increasing urban population needs feeding ,the basic right of our people should be the availability of healthy freshly grown food from our own country ,this proposal will force up vegetable prices and poorer segments of our communities will go without good quality vegetables	Strike out all provisions that limit the production of freshly grown produce for our domestic market. Educate the sector on nutrient and water efficiency to maintain yield at optimum efficient levels. Strike out Policy 3 (b)
Policy 4	Support with amendment	Low and medium diffuse discharges of nutrients should be promoted and not vilified by the wider community, if there is no use of resources , there is no life in the community.	Remove ~~While signalling further change may be required in the future.~~
Policy 6	Oppose	Restricting land use change, will stifle innovation , development and best use of resources , all land use changes should be a permitted activity , as long as they meet BMP's and do not place a greater burden of discharges on the river system compared to the enterprises current outputs. Restricting land use change will devalue our region and reduce our natural competitive advantage in the world today.	Strike out Policy 6 and replace with the following; Land use change will be a permitted activity that is subject to Farm Environment Plans that can demonstrate that the environment is not negatively impacted by this change.
Policy 6 (b)	Support		

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Policy 11,12,13	Support		
Policy 16	Oppose	Totally oppose the makers of the rules giving themselves special privileges at the expense of everyone else. If for Maori the highest good is improving the river let them be subject to the same provisions as existing land holders.	Remove policy 16
3 11.4 2	Conditional Support	Concerns that there is few details of what this will look like	We seek the council to make available information on criteria for certifying industry schemes and WRC undertaking that this will be available and in place by 22nd October 2017
3.11.4.3	Conditional support	Need details to make this operative, these plans need to promote industry best practise and should debated and agreed between WRC and industry represention and must able to be appealed by the land holder The WRC CEO should not have absolute power	Make provision for these plans to be appealable by the land holder
3.11.5.3 Rules	Conditional support	Need understanding of FEP's Industry certified schemes , controls exercised by WRC and certification of Farm Environmental planners	Need clarity and exercise of systems,checks and balances with regard to certification and running of FEP mechanisms
3 11.5 5	Oppose	The restriction on providing the ability to use more land for local food production is short sighted and flawed, and will reduce the health of the poor people in our nation	Remove Rule 3 11 5 5 (f)(g) Matters of control ii
3 11 5.6	Support		
3 11.5 7	Oppose	Restricting LUC will restrict economic growth , this is direct conflict with the NPS –FW that specifically directs local government to provide for economic growth , while managing water in an integrated and sustainable way Consequential job losses and social impacts are too great , this is all modelled in the HRWOPFC simulation, integrated assessment of baseline scenario's For our business it presents itself as a lost opportunity cost of a least $ 2000/ha/annum and a loss of gross domestic product of at least $10000 /ha /annum	Change this to a permitted activity that is subject to showing land use change is neutral and or reducing the discharge of nutrients into the river system, Also allow for offsetting that brings in land more suitable for primary production and retires other land of higher risk in its place.

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3.11.5.7 continued	Oppose	Land use change should be a permitted activity that is subject to the same tests as other forms of activity -best use of resources -land suitability -land use capability Land use restrictions stop investment and development of resources to their best potential and restricts improvement in use of resources that will improve the economic and social outcomes for NZ This stops the opportunity to improve land development by retiring high risk land in favour of low risk land.	Remove rule 3.11.5.7 And make land use change subject to FEP that complies with the restriction of nutrient loss as a permitted activity where there no net change of diffuse discharges of nitrogen , phorphorus ,sediment or microbial pathogens across an enterprise
3.11.5.7 continued	Oppose	Land used for arable cropping within a property who's principle activity is dairying should be allowed it is unclear as to how different uses of land within an enterprise will be treated	Existing multiple land use change within a property is a permitted activity under the control of the FEP
Schedule B NRP(f)	Oppose	That enterprises have the choice of any of the previous 5 financial years as their NRP Using just 2015/16 years disadvantages farmers who have had improving environmental practices and have been reducing their environmental footprint year on year, compared to those who have intentionally increased nutrient loss in anticipation of grandparenting. The 75% rule will put a limit on this	That the reference period be taken from any year from 2011 to 2016 at the land holder discretion

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