

# PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 WAIKATO AND WAIPĀ RIVER CATCHMENTS



Submission form on publicly notified – Proposed  
Waikato Regional Plan Change 1 – Waikato and  
Waipā River Catchments.

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

SubForm	PC12016	COVER SHEET	
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		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

## 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>	healthyivers@waikatoregion.govt.nz <i>Please Note: Submissions received by email must contain full contact details.</i>
<b>Online at</b>	www.waikatoregion.govt.nz/healthyivers

**We need to receive your submission by 5pm, 8 March 2017.**

## YOUR NAME AND CONTACT DETAILS

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Phone: 07 8240948 Fax: \_\_\_\_\_

## ADDRESS FOR SERVICE OF SUBMITTER

Full name: Peta Lean

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## 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:
- adversely effects the environment, and
  - 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.

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**

Signature: *P. A. Leon*

Date: *2-3-17*

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.

## 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).

PC 1 as an idea/plan. PC1 is the means to carry out the vision and strategy for the Waikato River. The vision states the assumptions which underpin PC1. "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."

(3)

The values below have been prepared and are supported by the Collaborative Stakeholder Group

## 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).

The vision contains conflict which makes it unattainable. The vision is only for a "healthy" river and a "healthy" river is a long continuum. How unhealthy is this river today? The healthy river which is drinkable I would suggest is unattainable without an economically unviable dairy industry, and largely forested catchment with few towns.

The costs involved in extensive fencing of hill country by many farmers will certainly mean they not be able to be prosperous, "Farm Environment Plans" and NRPs which have to be produced by "Certified Farm Environment Planners" are an unknown expense and it is clear that "prosperous" is not going to be compatible with PC1s mechanism of getting to a "healthy" river - certainly not in my case. The grandparenting of landuse means investment in alternative and innovative uses of the land will be off the table - the Resource consent is too risky and too expensive for a small farmer.

Given the vision talks about generations to come, the uncertainty of what will come in legislation and control after the first 10 years of this Plan Change makes investment in any landuse uncertain. With this in mind the vision of any prosperous rural community is flawed. There are only so many "auditors/experts" of the proposed Plan Change that can make up a community and the landowner will be the payer.

Plans which are aspirational to achieve the improved river quality would provide a much less controlling and innovation sapping and investment discouraging means to the vision of a "healthy" river.

The current plan change will not make the river any healthier because the big polluters can remain big polluters. "Clean" landusers must pay the same costs of compliance with the plan without any hope of an increase in output. Currently the river leaving my property is half as "dirty" as when it arrived, yet farmers like me will be penalised and hamstrung by clean practices.

## 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
- Decline the above provision
- If not declined, then amend the above provision as outlined

**ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION**

**Section number of the Plan Change:** Rule 3.11.5.2 and 3.11.5.7

**Do you support or oppose the provision?**

Support

Oppose

**Submission**

*State in summary the nature of your submission and the reasons for it.*

3a - If you are concerned about what happens on that piece of land, why should you worry about other pieces of land. Even with activity "forming part of an enterprise being undertaken on more than one property" the total area is not more than 20ha.  
 3c - "A Certified Farm Environment Planner" is another layer of control which I will pay for, making my operation unviable. No 5 is more than adequate to enforce the provision to prevent people changing to a more economically productive use of the land.

5. "Annual stock nos, annual fertiliser use, annual bought in feed." These vary from year to year depending on markets, weather, cost and stock numbers obviously vary from season to season considerably so the time of year can make a big difference as to carrying rate. Again another administrative cost for a small operator to bear, making economic use of the land unviable. I provide the data for someone to analyse that I pay rates for to control my actions for no benefit to the Waikato River.

**Decision Sought**

*State clearly the decision and/or suggested changes you want Council to make on the provision.*

3a Delete "do not form part of and enterprise on more than one property"

3b Delete - The permissible stocking rate is arbitrary and bears no relation to effect on the water.

3c - Delete

5. - Delete

Outputs need to be monitored, not inputs to farm management. The carrying capacity and leaching from soil depends on the soil characteristics and its management. Measure the water as it enters and leaves the property to determine the effect on the water.

**Section number of the Plan Change:** 3.11.5.2 and 3.11.5.7

**Do you support or oppose the provision?**

Support

Oppose

**Submission**

*State in summary the nature of your submission and the reasons for it.*

While I like that farming is a permitted activity for small under 20 ha properties, I do not like that any change in activity (over 4.1ha) seems to require an expensive resource consent. This seems to stifle land use innovation, even to what might be more environmentally friendly activities eg Nut farming. Resource Consents create uncertainty, costs of Environment Plans and Certified Environmental Farm Planners, gaining NRPs to prove compliance will not make me or any other land owner prosperous. More important, it will not make the river any more healthy.

**Decision Sought**

*State clearly the decision and/or suggested changes you want Council to make on the provision.*

Other farming activities that are permitted without resource consent should be listed eg Tree Crops, Viticulture, Alpacas

Changes in landuse in properties under 20ha are permitted.

**ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION**

**Section number of the Plan Change:** Schedule A - 5 f

**Do you support or oppose the provision?**

Support

Oppose

**Submission**

*State in summary the nature of your submission and the reasons for it.*

5 a f - Calculations of stocking rates for compliance at any one time will be time will always be inaccurate and may give a skewed picture of an operation - one day can make a big difference in rates. Animals grow and become worth different stocking rate values at different ages. Stocking rates fluctuate so much during the year when cows have calves and from year to year depending on sales and weather conditions.

My operation is clean so it would seem unfair that high polluters are treated the same as I am on a very small, clean operation.

**Decision Sought**

*State clearly the decision and/or suggested changes you want Council to make on the provision.*

Delete 5 f.

Plan needs to be based on outputs to the water, not manage farmer inputs. Permissible stocking rates are ridiculously low for my property.

**Section number of the Plan Change:** Schedule B

**Do you support or oppose the provision?**

Support

Oppose

**Submission**

*State in summary the nature of your submission and the reasons for it.*

NRP - In the regional drain that runs through my property NRP will be determined by activities upstream. How can I lower a NRP determined by other properties? How will you measure the NRP change attributed to me? How often will you measure it?

I will have to pay the cost of getting an NRP on which probably I will have no effect. Given that I have not put any N fertiliser on my property for almost 10 years, why should I have to pay to prove that.

**Decision Sought**

*State clearly the decision and/or suggested changes you want Council to make on the provision.*

Properties which have a high NRP should be identified and worked with to decrease the NRP.

No NRP for properties under 20ha.

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The property in question is 6.9ha at 81 Marychurch Rd, Cambridge. It is owned by the Kivell Lean Trust of which I am a trustee. Currently it is farmed by the Lean-Kivell Partnership. The property is used as part of a Limousin Beef Stud Operation with the younger cattle earning their way up to our other small property. There is a house on the property. According to the Regional Council Website it is part of Subcatchment 2. I note the property over the road is part of Subcatchment 3.

The property has a regional drain running through the middle, a drain which is regularly sprayed by the Regional Council. The drain (and two contributory drains) are fenced from animals and a bridge is used to take animals across the drain. The only animals I have seen in the drain are eels, small fish, ducks and pukekholes.

I want good productive land to be used to provide food for people and some income as some compensation for the time and effort I put into the land. I care for the land as shown by:

1. Fencing of the waterways
2. A feedpad can be used during wet winter days
3. No use of nitrogen fertiliser at all
4. No use of outside supplementary feed
5. No cultivation of the land
6. The property has some tree planting

My farming operation has a measurable effect of improving the water quality of the regional drain. Testing which I have paid for shows the improvement to decrease all measured contaminants by 50%. The house bore water (very shallow) contains perfect drinking water – showing the effect of my operation on the water quality on the land.

Given the size of the operation, the requirement to a Farm Environment Plan constructed by a "Certified Farm Environment Planner" is wasteful of resources that I could use for such things as native planting, extending my feedpad, undersowing of new and better pasture or improving the genetics of my Limousin Cattle. The compliance requirements of even maintaining my current operation smack of handing control of my operation over to experts who will have big qualifications, big fee payments and big agendas but with little common sense. Given the small size of my operation increased costs are likely to be a nail in the coffin of a small, environmentally friendly farming operation.

In exiting the existing operation the resale value will be severely reduced because the only activity without a resource consent will be forestry. Be very careful what you wish for:

- 7ha of pine trees would be a serious underutilisation of fertile land.
- Or the land is left unused and overgrown as no permitted landuse is economically viable

PC1 leads to one ideal vision for the Waikato in 80 years and it has no place for farming. Who will be there to swim in the river? I hope the fish are tasty.

Peta Lean