

Further Submission on Proposed Regional Plan Change 1 and Variation 1 of Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments

Full Name of Submitter: Graeme Gleeson

Email Address for service: gbg.redley@xtra.co.nz

Postal Address: 441 Mangare Road
R D 1 Pukeatua
3880

Phone Number: 027 7273720

I am a person who has an interest in the proposal that is greater than the interest the general public has.

I wish to speak at the hearing in support of my further submission.

Please find attached to this email my further submission

If you have any questions regarding this further submission, please do not hesitate to contact me.

Thank you

Yours sincerely

Graeme Gleeson

17 September 2018

FURTHER SUBMISSION FORM

IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSION/S ON NOTIFIED:



PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPĀ RIVER CATCHMENTS AND VARIATION 1 TO PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPĀ RIVER CATCHMENTS

Save this PDF to your computer before answering. If you edit the original form from this webpage, your changes will not save. Please check or update your software to allow for editing. We recommend Acrobat Reader.

Council needs to receive your further submission by 5pm, Monday, 17 September 2018. Please read the notes on making a Further Submission at the end of this form before completing your submission.

IMPORTANT NOTE

A copy of your further submission must be served on the original submitter/s within 5 working days of being lodged with council. An address list of all submitters is included with the summary of decisions requested documents and is available at waikatoregion.govt.nz/healthyrivers

YOUR NAME, ADDRESS FOR SERVICE AND CONTACT DETAILS (MANDATORY INFORMATION)

Name of submitter (individual/organisation)	Graeme Gleeson	
Contact person (if applicable)		
Agent (if applicable)		
Email address for service	gbg.redley@xtra.co.nz	
Postal address for service	441 Mangare Road	
	RD1 Pukeatua 3880	
		Post code: 3880
Phone number/s	Home: 078724856	Business:
	Mobile: 0277273720	Fax:

IN ACCORDANCE WITH SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT:

I am:

- A person representing a relevant aspect of the public interest.
In this case, also specify the grounds for saying that you come within this category; or
- A person who has an interest in the proposal that is greater than the interest the general public has.
In this case, also explain the grounds for saying that you come within this category; or
- The local authority for the relevant area.

My reasons are (i.e. grounds for selection above):

PLEASE INDICATE WHETHER YOU WISH TO SPEAK AT A HEARING

- Yes, I wish to speak at the hearing in support of my further submission.
- No, I do not wish to speak at the hearing in support of my further submission.

JOINT SUBMISSION

- If others make a similar submission, please tick this box if you would 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 - NOTE A SIGNATURE IS NOT REQUIRED IF YOU MAKE YOUR SUBMISSION BY ELECTRONIC MEANS

Signed _____ Date 17th September 2018
Type name if submitting electronically

FURTHER SUBMISSIONS CAN BE SENT BY



Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240



Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton



(07) 859 0998



healthyrivers@waikatoregion.govt.nz *Please note: Submissions received by email must contain full contact details.*

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.

Personal information is used for the administration of the submissions 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.

Form 6 of Schedule 1, Resource Management Act 1991.

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1

NAME OF ORIGINAL SUBMITTER: Beef + Lamb New Zealand Limited **ORIGINAL SUBMITTER ID:** 73369

ADDRESS OF ORIGINAL SUBMITTER: PO Box 135, Fielding 4740

Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.

PROVISION (e.g. Objective 4 or Rule 3.11.5.1): All **SUBMISSION POINT ID** (e.g. PC1-1234 or V1PC1-1234): All

Do you support or oppose the submission? Support Oppose

THE REASONS FOR MY SUPPORT OR OPPOSITION ARE: **I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):** Give precise details
Tell us why you support or oppose this submission. These reasons will help us to understand your further submission

The B+LNZ submission is parallel to outcomes sought.

It has been identified that a sub-catchment approach is the preferred scale to manage contaminant loss and achieve the desired water quality attributes. This recognises 1) that the contaminant load and associated effect upon water quality differs somewhat between each subcatchment 2) improved water quality in each and every subcatchment will improve water quality in the main river stems; 3) it removes the false application of dilutant waters received from Lake Taupo and elsewhere which masks poor water quality arising from some subcatchments; 4) there is greater opportunity and incentive for neighbouring land users as a community (subcatchment groups) to participate, share knowledge and learnings and be collaborative in seeking mitigation options that will lead to improved water quality observable at a local level.

It is noted also many other submitters are also in favour of a sub-catchment approach.

B+LNZ have a universal mandate to promote the Farm Environment Plan (FEP) process to achieve better land use outcomes. This is being supported by B+LNZ extension activity

I seek the whole submission be allowed

B+LNZ Submission

The B+LNZ submission is parallel to outcomes sought.

It has been identified that a sub-catchment approach is the preferred scale to manage contaminant loss and achieve the desired water quality attributes. This recognises 1) that the contaminant load and associated effect upon water quality differs somewhat between each subcatchment 2) improved water quality in each and every subcatchment will improve water quality in the main river stems; 3) it removes the false application of dilutant waters received from Lake Taupo and elsewhere which masks poor water quality arising from some subcatchments; 4) there is greater opportunity and incentive for neighbouring land users as a community (subcatchment groups) to participate, share knowledge and learnings and be collaborative in seeking mitigation options that will lead to improved water quality observable at a local level.

It is noted also many other submitters are also in favour of a sub-catchment approach.

B+LNZ have a universal mandate to promote the Farm Environment Plan (FEP) process to achieve better land use outcomes. This is being supported by B+LNZ extension activity recommending a suite of industry good management practices as options that can be tailored to fit the unique circumstances as occur on every farm. The FEP places emphasis upon but not limited to 1) An awareness of high contaminant loss critical source areas; 2) A pragmatic approach to livestock exclusion and other mitigation actions recognising reasonableness, practicality and affordability; 3) An emphasis to adopt livestock policies that have a better fit with the underlying capability of the natural resource i.e. the land; 4) The identification of land perhaps more suitable to other purposes other than pastoral grazing which could lead to a better balance and diversity within the farm business.

B+LNZ seek that like land having similar capability be treated equally regardless of existing or current land use and so policy and rules should primarily be effects based. Consequently, the notified Plan Change 1 'grandparenting' allocation framework for nitrogen severely penalises land use with low N loss rates and is not based upon effects. Farm systems that have low N loss rates will in many instances be contributing to waterway contaminant load, individually and cumulatively that would be under the threshold or other load limit(s) to satisfy water quality attributes for example swimmability when such community activity would occur. A grandparented nitrogen allocation is overly restrictive for low N loss farm businesses when it should not be therefore it does not allow opportunity and innovation to adjust land use to optimise the farm system or buffer market and climatic change. There is a high level of inequity and unfairness when the headroom created by grandparenting is used to offset for no consideration the environmental harm and nuisance created by other land users with high N loss thereby absolving them of making necessary reductions and system change. This constitutes high N loss business-as-usual protectionism where the externalised costs continue inappropriately and wrongly to be sanctioned. To amend this B+LNZ are wanting an allocation pathway that has a better fit with the

natural capability of the land recognising the different versatility classes that occur for different land parcels.

B+LNZ are wanting a clearer pathway forward that can continue in an adaptive manner beyond Plan Change 1 thereby giving effect to the Vision and Strategy. This provides greater certainty providing confidence to invest in change and if necessary modify existing land use if required as the direction and pace of travel is established.

With an adaptive pathway forward established it provides farm businesses via the GEP to articulate required transitional time to allow change in land management and usage avoiding immediate stranding of invested capital which may have been misplaced. This is more pragmatic and rational considering the associated financial cost, the time-frame to execute and scale of work to be undertaken.

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1

NAME OF ORIGINAL SUBMITTER: NZ Deer Farmers Waikato - Waipa **ORIGINAL SUBMITTER ID:** 74008

ADDRESS OF ORIGINAL SUBMITTER: Lindsay Fung PO Box 107102 Wellington 6143

Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.

PROVISION (e.g. Objective 4 or Rule 3.11.5.1): All **SUBMISSION POINT ID** (e.g. PC1-1234 or V1PC1-1234): All

Do you support or oppose the submission? Support Oppose

THE REASONS FOR MY SUPPORT OR OPPOSITION ARE: **I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):** Give precise details
Tell us why you support or oppose this submission. These reasons will help us to understand your further submission

Often when we consider agricultural land use it is narrowly defined and so excludes other smaller sectors that nevertheless are equally important. I am therefore supportive of the submission provided by the NZDFA because deer farmers typically manage farms with integrated livestock policies i.e. Sheep, Beef-cattle, Dairy and dairy support alongside Deer. Consequently there is a good need to be inclusive and consider the need to account for deer-specific behaviours, management approaches and resultant mitigation costs if and where required.

It is noted the NZDFA is also supportive of using the Farm Environment Plan (FEP) in a manner not dissimilar to B+LNZ, where on-farm risk is prioritised and managed appropriately to the on-farm situation and the contaminant priority for the subcatchment.

I seek the whole submission be allowed

FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1

NAME OF ORIGINAL SUBMITTER: Hill Country Farmers Group **ORIGINAL SUBMITTER ID:** 73321

ADDRESS OF ORIGINAL SUBMITTER: Kirstie Hill 84 Waipuna Road Waerenga RD1 Te Kauwhata 3781

Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.

PROVISION (e.g. Objective 4 or Rule 3.11.5.1): All **SUBMISSION POINT ID** (e.g. PC1-1234 or V1PC1-1234): All

Do you support or oppose the submission? Support Oppose

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<p><i>Tell us why you support or oppose this submission. These reasons will help us to understand your further submission</i></p> <p>The Hill Country Farmers Group submission clearly identifies the hardships and impracticalities that will be imposed by Plan Change 1 as notified upon farmers who are placed in hill country environs and typically operate farm businesses with livestock policies that integrate in part a mixture or singularly sheep, beef-cattle, dairy support and deer. Of particular concern is the Plan Change 1 rule demanding livestock exclusion and need to provide buffer separation to waterways when the cost benefit is dubious, the time frames to complete will be impossible, it shifts focus away from other contaminant loss critical source areas that should be the priority. There is also concern that investment made in livestock exclusion may have limited utility in future plan changes if such plans demand a land use shift towards afforestation. This risk is real because Plan Change 1 is of limited time duration, it has been presented to follow a staged rather than an adaptive approach to realise improvements in water quality consequently there is no certainty as to what comes next.</p>	<p>I seek the whole submission be allowed</p>
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NOTES ON MAKING A FURTHER SUBMISSION

1. Serving a copy of your further submission

A copy of your further submission must be served on the original submitter within 5 working days after it is served on (i.e. received by) Waikato Regional Council.

2. Further submission content review

Please note that your further submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

3. Privacy information

The Waikato Regional Council will make all submissions and further submissions including name and contact details publicly available on Council's website. Under the RMA, any further submission supporting or opposing an original submission is required to be served on the original submitter after it is served on council therefore your contact details must be made available.

Personal information will also be used for administration relating to the subject matter of the submissions, including notifying submitters of hearings and decisions. All information will be held by the Waikato Regional Council with submitters having the right to access and correct personal information.

Contact us for more information

Phone: 0800 800 401

Email: healthyivers@waikatoregion.govt.nz