

# 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	
<b>FOR OFFICE USE ONLY</b>			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

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

## 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>	<a href="mailto:healthyivers@waikatoregion.govt.nz">healthyivers@waikatoregion.govt.nz</a> <i>Please Note: Submissions received by email must contain full contact details. We also request you send us a signed original by post or courier.</i>
<b>Online at</b>	<a href="http://www.waikatoregion.govt.nz/healthyivers">www.waikatoregion.govt.nz/healthyivers</a>
<b>We need to receive your submission by 5pm, 8 March 2017.</b>	

## YOUR NAME AND CONTACT DETAILS

Full name	<u>Eel Enhancement Company Limited</u>		
Full address	<u>PO Box 104 016, Auckland 0654.</u>		
Email	<u>tom@hrm.co.nz</u>	Phone	<u>093787001</u>
		Fax	<u>09 3786939</u>

## ADDRESS FOR SERVICE OF SUBMITTER

Full name	<u>Eel Enhancement Company, (contact person is Exec. Officer = Thomas JB Hollings)</u>		
Address for service of person making submission	<u>PO Box 104 016, Auckland 0654.</u>		
Email	<u>tom@hrm.co.nz</u>	Phone	<u>093787001</u>
		Fax	

## 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 affects 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.

**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.)*

Please see attached 2 pages

**I SUPPORT OR OPPOSE THE ABOVE PROVISION/S**

*(select as appropriate and continue on separate sheet(s) if necessary.)*

- Support the above provisions Please see attached 2 pages
- Support the above provision with amendments
- Oppose the above provisions

**MY SUBMISSION IS THAT**

*(Please state the reasons why you support or oppose or wish to amend the specific provisions outlined)*

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

Please see attached 2 pages

**I SEEK THE FOLLOWING DECISION BY COUNCIL**

*(select as appropriate and complete the following decision)*

- Accept the above provision Please see attached 2 pages
- 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:* Please see attached 2 pages

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

**Yes**, 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**

**Yes**, 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**

**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 via electronic means*

Signature

Date

W 8 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.

## Additional sheet 1 of 2, to assist in making a submission, by EEC0;

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.
Plan Change	Support	We support the Vision and Strategy and thank the Iwi and Council for the commitment of care and energy and resources for the betterment of the Waikato & Waipa. We support an approach that is outcome based, that devolves responsibilities and costs to polluters and abstracters, and that is likely to be achieved and within a reasonable timetable. However we submit that the planned implementation is; highly-complex, highly-dependent on “buy-in” from resource users, and is potentially too slow eg 10% achievement after 10 years of an 80 year timetable. Eg Policy 2e) Stock exclusion from waterways at latest by mid 2026.	Commit to an entirely Independent Review 5 (not 10) years hence starting ~ Dec 2021 for completion May 2022 to ascertain if the plan has and will attain targets and failing that what actions should be taken by Waikato Regional Council.
Property Scale Nitrogen Reference Point	Support but seek extension to address fine sediment discharges	Fine sediment is possibly an even bigger hazard for aquatic life than nitrogen wastes. Fine sediments have ongoing adverse effects in lowland waterways and in coastal waters	Apply the Property Scale Nitrogen Reference Point system to also cover sediment especially fine sediments and applying 80 year targets in the short term.
Plan does not apply to NE of the Waikato sub-region, as that part was withdrawn.	Do not support this omission (withdrawal) of a large part of the Plan (~ 15 pages of withdrawals of 120 pages)	The entire Waikato Catchment’s Plan should be released as an integrated whole. That may mean partial withdrawal of that already released, and then later its re-Proposal, and if so, then so-be-it.	Preferably withdraw the Plan change that is Proposed for part of the Waikato, or alternatively extend the deadline for submissions.

**Additional sheet 2 of 2, to assist in making a submission, by EEC0;**

Willow removal	Oppose current Plan provisions	Our submission relates to the current and ongoing/un-amended provisions in the existing Plan wherein it is a Permitted activity to remove an unlimited quantity of Willows only subject to overly-weak and under-enforced limits on adverse externalities such as associated silt release. Recent very poor Willow removal practices in Karapiro stream and the lower Waipa are examples of what should be avoided eg for reasons of fine-sediment pollution alone. The fact is that Willows contribute enormously to the ecological and amenity quality of Waikato waterways and associated aquatic life. We acknowledge that Willow control for/at some; times, places and species can be positive. In future where Willows are to be removed, that should be subjected to Permitted Activity limits on quantity/timing plus strict permitted activity limits re associated fine sediment release. Removals in excess of permitted levels should require a Discretionary consent with requirement to provide/justify equivalent riparian quality post-removal.	Amend Waikato Plan preferably Region-wide otherwise re the sub-Region as Proposed re Willow removal to require; 1/ The Permitted Activity Standard to have limits on quantity/timing, plus strict permitted activity limits re associated fine sediment release. 2/ A (new) Discretionary consent requirement for larger (than Permitted) amounts of Willow removal or pruning plus associated requirement to provide/justify equivalent subsequent riparian quality after removal. Making this change will enhance the Region's or sub-region's environment in accordance with the Vision and Strategy and Objectives.
Allocation of Discharge Rights	Do Not yet Support	The two key issues in good resource management, are 1/what management measures to take and 2/ Allocation of who gets the benefits and costs. The fisheries Quota regime has been a big success and has useful parallels. However while the Council is to be commended for identifying and seeking to move to quotas to cover discharge externalities there is as yet no clear answer on allocation and so it is too early to prescribe that as the answer. Also the stakeholder/Users group is unlikely to devise a good and fair solution and so Council is encouraged to provide the solution, which fair to say will not be easy. Iwi is another significant factor. Best wishes with all that ! However the sooner the better as such things do not get easier over time.	Council itself to address and devise the allocation program.

*page 5/5*