

Form 5

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR VARIATION

Clause 6 of Schedule 1, Resource Management Act 1991

To: Waikato Regional Council (WRC)

Name of submitter: Ashleigh Chanelle Pardoe Millington

- 1 WRC notified Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments and Variation 1 to Proposed Waikato Regional PC1 on 16 October 2016.
- 2 This is a submission on:
 - 2.1 Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments (PC1);
 - 2.2 Variation 1 to the Proposed Waikato Regional Plan Change 1 (PC1) – Waikato and Waipa River Catchments (Variation 1); and
 - 2.3 I am interested in looking at both of the proposals generally, and how they particularly relate to the withdrawn area.
- 3 I could not gain an advantage in trade competition through this submission.
- 4 The specific provisions of the Variation that my submission relates to are:
 - 4.1 Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit.
 - 4.2 Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens.
 - 4.3 Policy 6: Restricting land use change.
 - 4.4 Policy 15: Whangamarino Wetland.
 - 4.5 Rule 3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities.

4.6 Rule 3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environmental Plan not under a Certified Industry Scheme.

4.7 Rule 3.11.5.7 Non-Complying Activity – Land Use Change.

5 Submission

I support the provisions outlined at paragraph 4, and wish to have them retained or amended to ensure the objectives are achievable upon implementation.

The aim of PC1 is to improve the water quality in the Waikato and Waipa River Catchments, with the focus on reducing diffuse discharges; nitrogen, phosphorus, sediment and bacteria. This submission supports the need for stringent rules to limit land use as a way to restore and protect water quality in the Waikato and Waipa Rivers.

PC1 implements an 80 year target to improve water quality. This submission looks to whether the 6 provisions outlined at paragraph 4 work towards achieving this overall target.

Objective 3: I support this objective, it requires measurement to ensure the actions implemented are achieving sufficient reductions of discharges, in order to achieve the 80 year target.

Policy 1: I support this policy, it identifies what discharges should be focused on. There is a discrepancy between what is required from one activity to another. Policy 1(a) requires activities that already produce low levels of contaminant discharges to not increase. Policy 1(b) requires activities with moderate to high levels to be reduced. There is no specification of what level the activity needs to reduce to, or how much it should reduce by. This suggests that even a minor decrease will be classed as a reduction. To achieve equality between activities, all activities should be required to achieve a low level of contaminant discharge.

Policy 6: I support this policy, it restricts the change in land to ensure discharges are not increased. The way it reads could be improved to make it clearer.

Policy 15: I support this policy, it focuses on reducing discharges to protect the wetland and in doing so this recognises that the Whangamarino Wetland is a Ramsar site, therefore of national and international importance. Restoration of the Wetland contributes towards the preservation of water quality.

Rule 3.11.5.1: I support this rule, it is a reasonable approach as it permits small and low intensity farming activities.

Rule 3.11.5.4: I support this rule, it needs to be clearer as it is called a "Controlled Activity" yet in the body of the rule there is reference to a permitted activity.

Rule 3.11.5.7: I support this rule, it requires a resource consent where there has been a change to the land. This rule supports Policy 1 and 6 as land use change consents will not be granted where there is an increase in the diffuse discharges. This rule also supports the encouragement towards decreasing diffuse discharges as where it can be proved that the use of land has decreased discharges, consent applications will be granted, which produces an incentive to decrease discharges.

6 Retain and amend the provisions as follows:

- 6.1 Objective 3: Retain and amend. Stipulate that the short-term goal is measured by a 10 year period and specify what date in 2026 the measurement will take place. Outline clearer that the targets for each river are contained in Table 3.11-1. Require all contaminants are given equal weighting when assessing reductions to ensure that each contaminant is reduced.
- 6.2 Policy 1: Retain and amend. Identify what is classified as a low and medium to high level of discharge. Gain a consensus of what level is "low". Re-write Policy 1(b) to require farming activities to decrease their levels of contaminant discharges "to a low level of contaminant discharge to water bodies and ensure those discharges do not increase".
- 6.3 Policy 6: Retain and re-write, "Land use change consent applications will generally not be granted where it is demonstrated there is an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens. Land use change consent applications will generally be granted where it is demonstrated there is clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens."
- 6.4 Policy 15: Re-include.
- 6.5 Rule 3.11.5.1: Retain and amend policy to reflect that small and low level intensity farming activities should not

allow discharges to increase. Outline what level of discharge is identified as low.

6.6 Rule 3.11.5.4: Retain. The status of the activity requires clarification as to whether it is a controlled or permitted activity.

6.7 Rule 3.11.5.7: Retain.

Decisions sought:

7 I seek the following decisions from the local authority:

7.1 The provisions be accepted and amended as outlined in paragraph 6.

7.2 Such alternative, consequential or further relief as may be required either to promote sustainable management or to give effect to this submission.

8 I wish to be heard in support of my submission.

Ashleigh Millington

20 May 2018

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