

Submission: Variation 1 To Proposed Waikato Regional Plan Change 1 Waikato And Waipa River Catchments.

This is a supplementary submission to the submission made by the Primary Land Users Group (PLUG). The description of the organisation including contact details and address for service are as stated in our primary submission.

PLUG understands from information available from WRC that it is not necessary to repeat matters in this submission already canvassed in submissions made on PC1. This submission therefore focuses on matters arising from Variation 1.

Issue:

Amendments to Plan Change 1 to alter some of the dates applying to provisions, including the dates at which provision of information is required related to parts of the Plan.

Submission:

PLUG's primary submission is that PC1's focus on 'maintaining' the existing situation amounts to grand parenting patterns of pollution in direct proportion to existing property use. As such it disproportionately disadvantages those whose property use has had the least adverse effect and discourages change and innovation aimed at improved environmental outcomes.

Variation 1 proposed to defer the dates at which aspects of PC1 need to be complied with. As such, the proposal is to defer the date at which better environmental outcomes could arise through the application of Best Practicable Option (BPO) resource management where BPO's are not currently being applied.

PLUG's concern is that 'maintaining' the current level of impact by delaying the time at which information and action is required is inconsistent with the Vision & Strategy's expectation that catchment water quality will be improved. We contend that the delay will extend the period of regulatory uncertainty and delay investment in water quality improvement. It could act to encourage perverse environmental outcomes, where in the absence of any direction to apply the BPO, property owners could act to maximise their permissible Nitrogen Reference Point (NRP) in order to maintain land use flexibility and property value.

Relief Sought:

Retain the dates applying to provisions including the dates at which provision of information is required to those specified in PC1.

Issue:

3.11.1.2 Mana Tangata –Use Values

Submission:

PLUG's primary submission is that sustainable management of water resources in the Waikato Region will ultimately depend on resource users applying practical, qualified actions

in the use and management of their properties. The identification and adoption of BPO Farm Environment Plans will be made easier where the environmental objectives including cultural, economic and ecological expectations are made clear.

Variation 1 proposed to amend 3.11.1.2 to include “...or have properties that require additional caution or care.” The inclusion of the word “or” implies additional caution and care is required in managing water subject to this section beyond that required to achieve spiritual, cultural and physical wellbeing. PLUG is opposed to the proposed inclusion (“...or have properties that require additional caution or care.”) because it is uncertain, appears to extend the obligation inherent in this section and therefore has the capacity to detract from PLUG’s interest in the identification and adoption of clear BPO management.

Relief Sought:

Amend the wording of 3.11.1.2 to “.....that support spiritual, cultural and physical wellbeing *requiring* additional caution or care.”

Issue:

3.11.2 Objectives – amendment to Plan Change 1 to include new text in Objective 1:

“Objective 1 sets the overall context for what is to be achieved in terms of water quality improvements. There is not any hierarchy of Objectives 1 to 6”

Submission:

PLUG supports the inclusion of the additional text as it is consistent with the purpose of the Act as set out in Part 2.

Relief Sought:

Retain the additional text.

Issue:

3.11.4. Implementation methods / Lakes and Whangamarino Wetland

Submission:

PLUG understand from information available from the Department of Conservation (DOC) that Koi Carp is a major pest and has significant detrimental effect on valued biodiversity and sediment levels in the Lakes and Whangamarino Wetland within the area covered by Variation 1. We support the proposed identification of the need to “work towards managing the presence of pest weeds and fish in the shallow lakes and connected lowland rivers area....” and the extension of that work on pest fish to include Whangamarino wetland.

PLUG accept the statement in Variation 1 that Whangamarino Wetland Plan is a “priority”. We suggest identifying the Wetland as a priority and pest fish as a known and specific risk to this water bodies justifies a more proactive approach than wetland plan preparation.

PLUG's primary submission is that sustainable management of water resources in the Waikato Region will ultimately depend on resource users applying practical, qualified actions in the use and management of their properties. We are unclear how the proposed preparation of Lake Catchment Plans will address the management of pest fish in a practicable way, recognising that Koi Carp have not been included in WRC's Regional Pest Management Strategy. We are unclear what if any obligation related to the management of pest fish will or could accrue to property owners. We foresee a situation where;

- either the management of pest fish becomes the BPO for property owners within lakes and Wetland catchment,
- or alternative regulatory requirements imposed on property owners in these sub-catchment give rise to little or no benefit because the primary driver of sub-catchment water quality is contingent on the control or not of koi population density.

Relief Sought:

Amend 3.11.4.4 (d) to:

'Manage the presence of pest weeds and fish in the shallow lakes and connected lowland rivers area including Whangamarino Wetland where;

- *their presence has a significant adverse effect on sub-catchment water quality and,*
- *pest management represents the "Best Practicable Option" means of improving sub-catchment and catchment water quality. '*

PLUG would appreciate the opportunity to be heard in support of these submissions.

Yours sincerely

Bruce Cameron
Andy Loader
Co-Chair PLUG

From: [Healthy Rivers](#)
To: [Andy Loader](#); [Healthy Rivers](#); "[Bruce & Yvonne C](#)"
Cc: [pbuckley1036@gmail.com](#); [Murray Parrish](#); [Brendan Balle](#); [wclark@ps.gen.nz](#); [trevorsimpson@xtra.co.nz](#); [Jason Barrier](#); [Shane Croft](#); [Ian McDougall](#); [Kim](#); [Rosemarie Costar](#); [Fred Phillips](#); [Kelly Deihl](#)
Subject: RE: Submission on Variation 1 - Primary Land Users Group
Date: Wednesday, 6 June 2018 1:39:02 PM

Hi Andy

Thanks for your prompt response. I will attach this email chain to your submission.

I confirm that the contact details we have on file for your primary submission is noted below and these details will be recorded against your Variation 1 submission:

Primary Land Users Group
PO Box 913
Pukekohe 2340
Email – info@plug4growth.co.nz
Mobile - 0211303929

Kind regards

Keita

Healthy Rivers

WAIKATO REGIONAL COUNCIL | Te Kaunihera a Rohe o Waikato

P: 0800 800 401

F: [facebook.com/waikatoregion](https://www.facebook.com/waikatoregion)

Private Bag 3038, Waikato Mail Centre, Hamilton 3240

From: Andy Loader <ajloader@xtra.co.nz>
Sent: Wednesday, 6 June 2018 11:25 AM
To: Healthy Rivers <healthyrivers@waikatoregion.govt.nz>; 'Bruce & Yvonne C' <glenullen@gmail.com>
Cc: pbuckley1036@gmail.com; [Murray Parrish <murray.parrish@ojifs.com>](mailto:Murray.Parrish@ojifs.com); [Brendan Balle <brendan.balle@ballebros.co.nz>](mailto:Brendan.Balle@ballebros.co.nz); wclark@ps.gen.nz; trevorsimpson@xtra.co.nz; [Jason Barrier <jrlbarrier@gmail.com>](mailto:Jason.Barrier@xtra.co.nz); [Shane Croft <shane@croftconsulting.co.nz>](mailto:Shane.Croft@croftconsulting.co.nz); [Ian McDougall <ian.w.mcdougall@gmail.com>](mailto:Ian.McDougall@gmail.com); [Kim <kim@lochielfarmlands.co.nz>](mailto:Kim@lochielfarmlands.co.nz); [Rosemarie Costar <rosemariecostar@slingshot.co.nz>](mailto:Rosemarie.Costar@slingshot.co.nz); [Fred Phillips <44phred@gmail.com>](mailto:Fred.Phillips@gmail.com); [Kelly Deihl <kelly@environmentalmanagement.co.nz>](mailto:Kelly.Deihl@environmentalmanagement.co.nz)
Subject: RE: Submission on Variation 1 - Primary Land Users Group

Hi Keita

As Bruce is travelling overseas at the present time I will answer for PLUG.

In Relation to your questions listed below:

- Would you consider present a joint case if others make a similar submission? **No**
- Could you gain an advantage in trade competition through this submission? **No**
 - o Are you directly affected by an effect of the subject matter of the submission that:
 - a. Adversely effects the environment, and **No**
 - b. Does not relate to the trade competition or the effects of trade competition. **No**

Andy Loader

**Co-Chairman P.L.U.G.
Primary Land Users Group**

Ph: 09-279 9392

Cell: 021 379 297

P O Box 200173
Papatoetoe Central
Auckland 2156

From: Healthy Rivers [<mailto:healthyrivers@waikatoregion.govt.nz>]

Sent: Wednesday, 6 June 2018 10:48 a.m.

To: Bruce & Yvonne C

Cc: ajloader@xtra.co.nz; Healthy Rivers

Subject: RE: Submission on Variation 1 - Primary Land Users Group

Hi Bruce

I'm just following up on my message below, in case you didn't receive it.

Could you please advise as noted below?

Kind regards

Keita

From: Healthy Rivers

Sent: Wednesday, 23 May 2018 3:22 PM

To: Bruce & Yvonne C <glenullen@gmail.com>; Healthy Rivers <healthyrivers@waikatoregion.govt.nz>

Subject: RE: Submission on Variation 1 - Primary Land Users Group

Hi Bruce

We've received your submission, however we're missing a little bit of information. We require the answers to the following two questions in order for your submission to be processed in full

- Would you consider present a joint case if others make a similar submission?
- Could you gain an advantage in trade competition through this submission?
 - o Are you 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.

Could you please respond, as soon as possible, and I will ensure your answers are attached to your submission.

Kind regards

Keita

Healthy Rivers

[WAIKATO REGIONAL COUNCIL | Te Kaunihera a Rohe o Waikato](#)

P: 0800 800 401

F: [facebook.com/waikatoregion](https://www.facebook.com/waikatoregion)

Private Bag 3038, Hamilton East, Hamilton 3240

From: Bruce & Yvonne C <glenullen@gmail.com>

Sent: Wednesday, 23 May 2018 2:53 PM

To: Healthy Rivers <healthyrivers@waikatoregion.govt.nz>

Subject: Submission on Variation 1

Please find attached our submission on Healthy Rivers Variation 1

PLUG (Primary Land Users Group)
Bruce Cameron
R D 5

Tuakau 2695
Ph: 0274 531 382
glenullen@gmail.com

Andy Loader
021 379 297
ajloader@xtra.co.nz

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