

**WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1  
WAIKATO AND WAIPA RIVER CATCHMENTS**

**Submission Form**

Submission on a publically notified proposed Regional Plan prepared under the Resource Management Act 1991.

**On:** The Waikato Regional Councils proposed Waikato Regional Plan Change 1 - Waikato and Waipa River Catchments

**To:** Waikato Regional Council  
401 Grey Street  
Hamilton East  
Private bag 3038  
Waikato Mail Center  
HAMILTON 3240

Complete the following

**Full Name:** *SUZANNE MERLE GARLAND AND WILLIAM GRAHAM GARLAND.*

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**Phone (Cell):** *0274446175.*

**Postcode:** *3495.*

**Email:** *rohin\_farm@hotmail.com.*

I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

**I wish to be heard in support of this submission.**

*W. G. Garland*  
\_\_\_\_\_  
**Signature** *7. 8 2017*  
**date**

**WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS**

<p><b>The specific provisions my submission relates to are:</b></p> <p><b>State specifically what Objective, Policy, Rule, map, glossary, or issue you are referring to.</b></p>	<p><b>My submission is that:</b></p> <p><b>State:</b></p> <ul style="list-style-type: none"> <li>• <b>whether you support, or oppose each provision listed in column 1;</b></li> <li>• <b>brief reasons for your views.</b></li> </ul>	<p><b>The decision I would like the Waikato Regional Council to make is:</b></p> <p><b>Give:</b></p> <ul style="list-style-type: none"> <li>• <b>precise details of the outcomes you would like to see for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you seek</b></li> </ul>
<p><i>Provision</i></p>	<p>I support/ oppose/ and for each whether or not you wish to amend</p> <p>The reasons for this are:</p> <ul style="list-style-type: none"> <li>•</li> </ul>	<p>I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below</p> <p>As an alternative I propose</p> <ul style="list-style-type: none"> <li>•</li> </ul>

## Introduction

Sue and I farm sheep and beef on 430 hectares at the top end of the Mangapiko Catchment. We started farming in 1969 and have expanded the property since then.

During the late 1970's with the assistance of the W.V.A. we soil mapped the property and began soil conservation work. Over the years this led to biodiversity protection and more laterly , stock exclusion from waterways, retiring unproductive land and wetland restoration.

Despite the 30 plus years of doing a bit each year, we still have 10 years work in front of us and have a substantial annual maintenance commitment for work already done.

In our experience, having a plan along with an annual budget for capital works are the most important things in making progress. The latter of course, requires the farm to be profitable. The other important thing is to do it once and do it right.

In our view, the Farm Environment Plan should be the centrepiece of P.C.I. It should be the mechanism to identify sources of water degradation at a farm level. The plan should set the priorities, timelines and be the means of checking progress. There needs to be some flexibility to accommodate unknowns but the auditing of plans should be sufficiently robust to keep people honest.

P.C.I rules such as the provision for the N.cap and stock exclusion override priority setting at a farm level. While it is accepted it is easier to hold landowners to account with definitive rules, this can override the principle of determining where containment loads are coming from and using that as a means of prioritising. **For example**, in our case we have 40 wetlands that require stock exclusions under the rules. Stock still have access to about half of those sites. We know from independent water testing over 18 months that they are low contaminant sources.

On the other hand, several unfenced bush patches at the top end of steep gullies are high contaminant sites. Under P.C.I a planner will override the priorities set in the F.E.P because the rules say so.

In our experience, one impediment to getting optimum environment outcomes is the influence an inexperienced planner can have by focusing solely on numbers or detail as opposed to outcome.

As a long term Farm Environment Judge( BFEA ), I look at how well a riparian margin is managed, the consideration of overland water flow paths and is the fencing fit for purpose? Someone inexperienced will look at setback distances and whether the slope is under or over 15%.

In my view, a key to the success of P.C.I will be having Farm Environment planners with the right skill set and those doing the signing off and auditing of F.E.P having practical knowledge to allow them to make valued judgements.

If we look at what we have achieved on our property over the past 30 plus years and consider what it might look like had we been farming under P.P.C1 , we would be well short of where we are today.

The biggest advantage we had was the luxury of being able to consider the wider environmental issues and not constrained to focusing just on water quality.

We are now confronted with a future where everyone wants plans from Health and Safety to the supermarket we supply but no one is taking an overall perspective.

As a consequence, we are now less confident about the future of hill country farming than we were when we first started out.

**Bill Garland**

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

Provision	I support/ oppose/ and for each whether or not you wish to amend	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below
<p>VISION AND STRATEGY</p> <p>BACKGROUND AND EXPLANATION.</p> <p>FULL ACHIEVEMENT OF VIS PAGE 15 'ST PARAGRAPH.</p> <p>OBJECTIVE 4</p>	<p>The reasons for this are:            OPPOSE WORDING OF PARAGRAPH 1 PAGE 15.</p> <p>REASONS</p> <p>- PARAGRAPH 1 REFERS TO AN 80 YEAR TIME FRAME AND A REQUIREMENT THAT TO MEET THE WATER QUALITY STANDARDS IN THE VIS A CONSIDERABLE AREA OF LAND WILL HAVE TO BE REAFFORESTED. BUT MAKE NO MENTION OF THE LIKELY IMPACT ON PEOPLE AND COMMUNITIES.</p> <p>OBJECTIVE 4 STATES THAT THE COST TO PEOPLE AND COMMUNITIES HAS TO BE SUSTAINABLE.</p> <p>WHAT APPEARS TO BE TOTALLY OVERLOOKED OR NOT UNDERSTOOD IS BY STATING A SIGNIFICANT AMOUNT OF FARMLAND HAS TO BE REAFFORESTED THERE IS AN IMMEDIATE IMPACT ON THE OUTLOOK OF THOSE WHOSE FARMS ARE POTENTIALLY THE TARGET FOR AFFORESTATION.</p> <p>IT CREATES UNCERTAINTY AND MISTRUST. UNCERTAINTY COMPROMISES INVESTMENT DECISIONS, MAKE IT HARDER TO BORROW AND IS A SERIOUS BARRIER TO ENCOURAGING YOUNG PEOPLE INTO FARMING.</p> <p>THERE WAS GENUINE CONCERN AT THE SHEEP AND BEEF MEETINGS IN THE KING COUNTRY THAT</p>	<p>As an alternative I propose</p>

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**WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS**

<p>Provision</p>	<p>I support/ oppose/ and for each whether or not you wish to amend</p> <p>The reasons for this are:</p>	<p>I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below</p> <p>As an alternative I propose</p>
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# WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

Provision	I support/ oppose/ and for each whether or not you wish to amend	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below
	<p>The reasons for this are:</p> <p>REASONS CONTINUED.</p> <p>DESPITE FARMERS BEST EFFORTS TO REDUCE CONTAMINANT LOADS THEY COULD BE TOLD THEIR FARM IS REQUIRED FOR FORESTRY OR THAT STEEPER LAND SHOULD BE RETIRED TO OFFSET WATER CONTAMINATION FROM THE MORE PRODUCTIVE LAND.</p> <p>ACCEPTING THAT CONSIDERABLE FARMLAND AND THE LIKELY HOOD OF THOSE FARMING IT IS THE PRICE FOR ACHIEVING THE VIS IS NOT THE WAY FORWARD HILL COUNTRY FARMERS HAVE A HIGH RELIANCE TO TRAY IN ACHIEVING THE VIS. THEY ARE NOT GOING TO DO IT OR WILL DO IT HALF HEARTEDLY IF THEY DON'T HAVE CONFIDENCE IN THE FUTURE.</p>	<p>I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below</p> <p>As an alternative I propose</p> <p>REWRITE PARAGRAPH 1 PAGE 15 TO REFLECT THE INTENT OF OBJECTIVE 4.</p> <p>ACCEPT IF THAT SUCCESS IS ALL ABOUT GIVING STAKEHOLDERS CONFIDENCE IN THE FUTURE, IT IS NOT ABOUT HAVING AN ARBITRARY VISION FOR OUR RIVERS</p>

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

Provision	I support/ oppose/ and for each whether or not you wish to amend	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below
<p>NITROGEN REFERENCE POINT AND CAPPING NITROGEN LOSSES BASED ON THE 2014/2015 2015/2016 YEARS</p> <ul style="list-style-type: none"> <li>- BACK GROUND AND EXPLANATION</li> <li>- OBJECTIVES 3.4</li> <li>- POLICY 1-8</li> <li>- RULES 3.11.53 TO 3.11.57</li> <li>- SCHEDULE B.</li> <li>- SCHEDULE 1.</li> </ul>	<p>The reasons for this are:</p> <ol style="list-style-type: none"> <li>1/ SUPPORT - THE CALCULATION OF PROPERTY REFERENCE POINTS USING OVERSEER</li> <li>2/ SUPPORT POLICY 7 - PREPARING FOR ALLOCATION IN THE FUTURE</li> <li>3/ OPPOSE - THE USE OF THE 2014/15 OR 2015/16 YEAR REFERENCE POINTS TO CAP OR GRANDPARENT PROPERTY NITROGEN LOSSES FOR THE LIFE OF P.C.I</li> </ol> <p>REASONS</p> <ol style="list-style-type: none"> <li>1/ A REFERENCE POINT CALCULATED USING OVERSEER IS NEEDED TO ASSESS N LOADS OF A CATCHMENTS AND TO MEASURE PROPERTY TRENDS OVER TIME.</li> <li>2/ ALLOCATION OF N LOSSES PER PROPERTY SHOULD BE BASED ON LAND CAPABILITIES, SOIL TYPE AND RAINFALL.</li> <li>3/ - THERE ARE TOO MANY VARIABLES IN OVERSEER TO USE IT TO HOLD LANDOWNERS TO ABSOLUTE NUMBERS WITHOUT CREATING PROBLEMS FOR BOTH LANDOWNERS AND THE COUNCIL.</li> </ol> <p>GRANDPARENTED</p> <ul style="list-style-type: none"> <li>- EVEN IF N LOSSES ARE FOR JUST THE LIFE OF P.P.C.I IT SETS A PRECEDENT AND WILL CREATE TENSION BETWEEN THOSE WITH LOW N LOSS FARMING SYSTEMS AND THOSE WITH HIGH N LOSSES</li> <li>- IT WILL DISTORT LAND VALUES IN FAVOUR OF HIGH N LOSS PROPERTIES</li> </ul>	<p>I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below</p> <p>As an alternative I propose</p> <p>RETAIN THE PROVISIONS FOR THE NRP AS CALCULATED BY OVERSEER</p> <p>RETAIN - POLICY 7</p> <p>DELETE - 5(C) SCHEDULE 1 AND ANY OTHER REFERENCE TO REQUIRING N LOSSES TO BE CALCULATED ANNUALLY USING OVERSEER AND TO MAINTAIN A 5yr ROLLING AVERAGE OF N LOSSES AT OR BELOW THE NRP.</p> <p>DELETE III MATTERS OF CONTROL RULE 3.11.5.4</p>

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**WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS**

Provision	I support/ oppose/ and for each whether or not you wish to amend  The reasons for this are:	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below  As an alternative I propose

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

Provision	I support/ oppose/ and for each whether or not you wish to amend	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below
	<p>The reasons for this are:</p> <p>3/ CONT.</p> <ul style="list-style-type: none"> <li>- THE COMPLIANCE COST FOR LOW N LOSS FARMING SYSTEMS e.g. SHEEP AND BEEF WILL OUTWEIGH ANY BENEFITS AND WILL DIRECT RESOURCES AWAY FROM THE MORE URGENT WATER QUANTITY ISSUES IN HILL COUNTRY</li> <li>- GRANDPARENTING OR CAPPING N BASED ON HISTORIC N LOSSES PENALISES THOSE OF US WHO HAVE TRIED TO DO THE RIGHT THING AND EFFECTUALLY REWARDS THOSE THAT HAVEN'T</li> <li>- SHEEP AND BEEF FARMING SYSTEM TYPICALLY HAVE LOW N LOSSES BUT RELY ON FLEXIBILITY TO MAINTAIN A PROFITABLE AND BANKABLE BUSINESS.</li> <li>- WE HAVE NUTRIENT BUDGETS BACK TO 2002 THEY SHOW A N LOSS RANGE OF 10-23. 23 IS AN OUTLIER DUE TO OVERSEER MODELLING ERRORS. WHAT IT SHOWS IS A 20% VARIANCE DUE TO SEASONAL FACTORS RATHER THAN ANY CHANGES TO FARMING PRACTICES.</li> <li>- IF WE HAD BEEN FARMING UNDER P.P.C1 WE WOULD NOT HAVE MADE THE LEVEL OF INVESTMENT IN ENVIRONMENTAL ENHANCEMENT THAT WE HAVE. IF WE WERE NOT ABLE TO IMPROVE PROFITABILITY AND PRODUCTION FROM OUR BETTER LAND OR CHANGE OUR SHEEP TO CATTLE RATIOS TO MEET MARKET MARKET TRENDS WE WOULD NOT HAVE GENERATED SUFFICIENT PROFITS TO SUSTAIN OUR DISCRETIONARY SPENDING</li> <li>- P.P.C1 BY DEFAULT EXCLUDES NITROGEN AS A MORE IMPORTANT CONTAMINANT THAN THE OTHER THREE WHEN IT IS THE LEAST IMPORTANT CONTAMINANT ON SHEEP AND BEEF FARMS</li> </ul>	<p>As an alternative I propose</p>

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

Provision	I support/ oppose/ and for each whether or not you wish to amend	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below
<p>FARM ENVIRONMENT PLANS            PAGES 15+16            Policy 2            RULES 3 11.5.3 TO 3 11.5.7            SCHEDULES 1 AND 2</p>	<p>The reasons for this are:</p> <p>1/ SUPPORT THE PROVISIONS OF REQUIRING F.E.Ps IN PPC1.</p> <p>2/ CONCERN ABOUT THE LEVEL OF DETAIL REQUIRED IN SCHEDULE 1</p> <ul style="list-style-type: none"> <li>- THOSE RESPONSIBLE FOR APPROVING AND AUDITING A F.E.P DON'T APPEAR TO BE REQUIRED TO HAVE ANY REGARD FOR THE LANDOWNERS ABILITY TO MEET THE FINANCIAL OBLIGATIONS RESULTING FROM ACTIONS AND TIMELINES REQUIRED IN A PLAN.</li> </ul> <p>3/ OPPOSE - THE RANKING OF STOCK EXCLUSION AND MANAGEMENT OF N COMPARED TO OTHER MITIGATIONS OF CONTAMINANTS SOURCES IN A F.E.P</p> <p>REASONS.</p> <p>1- A F.E.P IS THE MOST EFFECTIVE MEANS OF MANAGING DIFFUSE DISCHARGES OF CONTAMINANTS AT A PROPERTY LEVEL</p> <ul style="list-style-type: none"> <li>- FARMERS LEARN FROM DOING A BIT EACH YEAR AND THE TIMELINES AGREED TO IN A PLAN ALLOWS FOR A SPENDING OF THE COST</li> <li>- DESPITE OUR LONG HISTORY OF UNDERTAKING ENVIRONMENTAL WORK ON OUR PROPERTY WE HAVE SEEN BENEFIT FROM COMPLETING BEEF AND LAMB LEP LEVEL 1 AND LEP LEVEL 2 F.E.Ps</li> </ul>	<p>As an alternative I propose</p> <p>RETAIN PROVISION FOR FARM ENVIRONMENT PLANS PAGE 15.</p> <p>RETAIN Policy 2 a.</p> <p>RETAIN 3 11 5 3 TO 3 11 5 7</p> <p>RECOGNISE IN SCHEDULE 1 THAT AT A FARM LEVEL THERE MAY BE OTHER PRIORITIES OTHER THAN STOCK EXCLUSION AND N LOSSES.</p> <p>REMOVE REFERENCE IN SCHEDULE 1 TO MANAGING N LOSS AT OR BELOW THE NRP USING OVERSEER AND A 5 YEAR ROLLING AVERAGE.</p> <p>MAKE THE SLOPE PERCENTAGES AND SETBACKS GUIDELINES IN SCHEDULE 1</p> <p>THERE IS INCONSISTENCY BETWEEN 3-11-43 F.E.P WILL BE PREPARED BY A CERTIFIED PERSON AND SCHEDULE 1 F.E.P SHALL BE CERTIFIED BY A CERTIFIED PLANNER.</p>

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<p>CONT</p>	<p>The reasons for this are:</p> <p>1/- FET'S CAN BE TARGETED TO SUIT INDIVIDUAL PROPERTIES AND THE FINANCIAL STATUS OF THE BUSINESS</p> <p>2/- THE LEVEL OF DETAIL PARTICULARLY AROUND SET-BACKS, SLOPE, AND REQUIREMENT TO SET TIMELINES WILL IN PRACTICE COMPLICATE THE DECISION MAKING PROCESS. FOR EXAMPLE HILL COUNTRY STREAMS AND WETLANDS ALL HAVE VARIABLE SLOPES NEXT TO THEM. GIVEN THIS HOW IS A LANDOWNER GOING TO DECIDE WHAT ACTION IS GOING TO BE ACCEPTABLE. WE HAVE A LOT WETLANDS SO ASSESSING THE APPROPRIATE ACTION FOR EACH OF THEM IS A MONUMENTAL TASK</p> <p>- TIME LINES FOR COMPLETING ACTIONS WILL BE COMMITTED TO IN GOOD FAITH HOWEVER IN OUR EXPERIENCE COST OVERRUNS FOR FENCING ALONE CAN BE AS MUCH AS 50% THERE IS NO CERTAINTY AN AUDITOR WILL ACCEPT COST OVERRUNS AS A REASON TO EXTEND TIMELINES LEAVING THE FARMER EFFECTUALLY WITHOUT A LICENSE TO OPERATE.</p> <p>3/- BECAUSE STOCK EXCLUSION AND MANAGING N LOSSES BELOW THE FARM N.R.P HAVE MANDATORY TIMELINES, BY DEFAULT THEY BECOME THE PRIORITY ACTIONS. N IS A LOW PRIORITY CONTAMINANT ON MOST SHEEP AND BEEF PROPERTIES. SIMILARLY IN HILL COUNTRY SUCH AS OURS STOCK EXCLUSION FROM WETLANDS AND MANY OF THE SMALLER STREAMS IS FAR LESS IMPORTANT THAN SEDIMENT LOSS AND UPPER GULLY MANAGEMENT WHILE UNDER THE SCHEDULE 1 REQUIREMENTS ALL CONTAMINANT LOSSES HAVE TO BE MANAGED IT COMES DOWN TO THE BEST P.P.C/DICTATES STOCK EXCLUSION AND N LOSSES</p> <p>RULES ARE WHERE MOST OF OUR ENERGY SHOULD GO.</p>	<p>As an alternative I propose</p>

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 WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

Provision	I support/ oppose/ and for each whether or not you wish to amend	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below
<p>REDUCTION OF CONTAMINANT LOSSES FROM FARMS                      PAGES 14-16                      OBJECTIVES 1 + 3                      POLICIES 1-7                      IMPLEMENTATION METHODS 3 11 4 + 7                      RULES 3 11 5 3 - 3 11 5 7                      SCHEDULES 1 + 2.                      TABLES PAGES 57-64</p>	<p>The reasons for this are:                      1/ SUPPORT THE USE OF F.E.Ps AS THE MEANS OF IDENTIFYING SOURCES OF CONTAMINANTS AT A FARM LEVEL AND THE ACTIONS TO REDUCE DIFFUSE DISCHARGES.                      2/ Support 3 11 4.7 D.                      3/ Oppose THE TIMEFRAMES SET OUT IN SCHEDULE 1 + 2 WHICH MUST BE CONSISTANT WITH OBJECTIVE 3.                      REASONS.                      1/ F.E.Ps OUTCOMES WILL BE TAILORED TO SUIT INDIVIDUAL PROPERTIES IN REGARD TO DIFFUSE CONTAMINANT SOURCES. F.E.P. ALSO REQUIRES LANDOWNERS TO CONSIDER HOW THEIR DAY TO DAY MANAGEMENT DECISIONS MIGHT IMPACT ON WATER QUALITY.                      2- REGIONAL COUNCIL HAS A CRITICAL ROLE IN SUPPORTING LANDOWNERS BY MAKING AVAILABLE WATER QUALITY DATA AT A SUBCATCHMENT LEVEL                      - LANDOWNER WILL ALSO WANT TO BE ABLE TO ACCESS CREDITABLE WATER QUALITY DATA AT A FARM LEVEL TO ASSESS WHETHER WHAT THEY'RE DOING ON FARM TO IMPROVE WATER QUALITY IS WORKING.</p>	<p>As an alternative I propose                      AMEND 3 11 4.7 D III TO READ                      FOR THE PURPOSE OF DEVELOPING TOOLS                      3/ 2ND PARAGRAPH SCH 1 STATES IDENTIFY ACTIONS AND TIMEFRAMES                      OBJECTIVE 3 REQUIRES ACTIONS TO BE IN PLACE BY 2026                      SCHEDULE 2 REQUIRES AN INDUSTRY PLAN TO BE CONSISTANT WITH OBJECTIVE 3.                      AMEND SCHEDULE 2 TO BE CONSISTANT WITH SCHEDULE 1.</p>

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	<p>The reasons for this are:</p> <p>By P.P. 1. REQUIRES THAT FEP BE PREPARED BY 2020 - 2026. THE FEP HAS TO SET CUT ACTIONS AND TIMELINES TO REDUCE DIFFUSE DISCHARGES OF CONTAMINANTS IN ACCORDANCE WITH OBJECTIVE 3. OBJECTIVE 3 REQUIRES ACTIONS TO BE IN PLACE BY 2026 - NOT POSSIBLE.</p> <p>A HILL COUNTRY FARMER COULD NOT BE REASONABLE EXPECTED TO COMPLETE STOCK EXCLUSION AND IMPLEMENT MEASURES TO REDUCE DIFFUSE DISCHARGES BY 10% IN AT THE MOST 5 YRS.</p>	<p>As an alternative I propose</p>

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<p>STOCK EXCLUSIONS            PAGES 15-16            RULEY 1.2.            SCHEDULE C AND 1            TABLES 3-11-2</p>	<p>The reasons for this are:</p> <ol style="list-style-type: none"> <li>1/ Support WITH AMENDMENTS STOCK EXCLUSION PROVISIONS.</li> <li>2/ Support THE EXCLUSION OF SHEEP FROM THE RULES</li> <li>3/ Support WITH AMENDMENTS <sup>2011</sup> <del>ALL</del> SCH 1</li> <li>4/ Oppose THE TIMELINES AS SET OUT IN THE RULES</li> </ol> <p>REASONS</p> <p>1/ WITHOUT A COMPREHENSIVE DEFINITION OF WATERWAYS AND WETLANDS IT IS DIFFICULT TO ASSESS THE IMPLICATIONS OF STOCK EXCLUSION RULES AT A PROPERTY LEVEL FOR EXAMPLE DOES A RIVER INCLUDE SMALL STREAMS THAT ONLY STOP RUNNING IN DROUGHT CONDITIONS.</p> <p>- FOR OURSELVES WE NEED TO KNOW THE DEFINITION OF A WETLAND. WE HAVE KC + WETLANDS RANGING IN SIZE FROM 200 SQ METRS TO 15 HA WATER QUALITY MONITORING DONE BY AGRISearch ON OUR PROPERTY SHOWED THAT AN UNFENCED WETLAND REDUCED PATHOGENS BY AS MUCH AS 60%. IN THE COUNTRY FENCED OFF WETLANDS OVER TIME REVERT BACK TO ROCKY BOTTOM</p>	<p>As an alternative I propose</p> <ol style="list-style-type: none"> <li>1/ A DEFINITION OF RIVER OR STREAM AND WETLANDS SHOULD BE INCLUDED IN SCHEDULE C OR C1 PAGES 74-83</li> <li>2/ RETAIN AS IS</li> <li>3/ SCHEDULE 1 <sup>2</sup> <del>ALL</del> SHOULD BE REWORDED TO READ FOR STREAMS OR WETLANDS WITH A SLOPE EXCEEDING 25% OR WHERE FENCING IS IMPRACTICAL THE PROVISIONS OF C SHALL MITIGATION MEASURES.</li> <li>4/ SCHEDULE 1 SHOULD INCLUDE A PROVISION FOR EXTENDED TIME FRAMES TO COMPLY WITH OBJECTIVE 4.</li> </ol>

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<p>cont</p>	<p>The reasons for this are:</p> <p>1) STREAMS OR CHANNELS CUT RESULTING IN NO A REDUCED FILTERING AFFECT AND DRAIN - STREAM SEDIMENT TRANSFER</p> <p>2) SUPPORT THE EXCLUSION OF SHEEP IN SCHEDULE C WE HAVE BEEN FARMING SHEEP ONLY AREAS THAT INCLUDES SECTIONS OF THE MANGAPIKE STREAM FOR A NUMBER OF YEARS. STREAM BANK EROSION IS LESS IN THOSE AREAS COMPARED TO SECTIONS OF THE STREAM COMPLETELY FENCED. INVERTEBRATE NUMBER ARE ABOUT THE SAME.</p> <p>3) SCHEDULE 1 c.11 IS AMBIGUOUS. ITS UNCERTAIN WHETHER THE PROVISIONS FOR MITIGATION MEASURES IS FOR SECTIONS OF THE STREAM WITH A SLOPE EXCEEDING 25% OR THE WHOLE STREAM. IT IS ALSO UNCLEAR "WHERE FENCING IS IMPRACTICAL" REFERS TO JUST THOSE AREAS ABOVE 25%</p> <p>4) OBJECTIVE 4 TAKES ABOUT THE FIRST STAGE MUST ENSURE THAT OVERALL COSTS TO PEOPLE CAN BE SUSTAINED. HOWEVER THERE IS NO MEANS OF EXTENDING TIMELINES FOR THOSE WHO MAY FACE EXCESSIVE FENCING COSTS AND DISRUPTIONS TO FARMING ACTIVITIES UNDER AN INDUSTRY SCHEME</p> <p>CO-17-10-10</p>	<p>As an alternative I propose</p>



WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

Provision	I support/ oppose/ and for each whether or not you wish to amend  The reasons for this are: CONTINUUM H/ WITHOUT THE ABILITY TO EXTEND TIMELINES FOR FARMERS WITH COMPLEX PROPERTIES <del>WILL</del> AND EXCESSIVE COSTS TO COMPLY WITH SPECIFIC EXCLUSION RULES THEY WILL EITHER CHOOSE THE CHEAP AND NASTY OR WHERE POSSIBLE USE LOW COST MITIGATIONS ALTERNATIVELY THEY MAY JUST RUN CATTLE NEXT TO THE WATERWAY AS OPPOSED TO SHEEP AND CATTLE CAUSING A PERVERSE EFFECT. IF IT WAS ADVISED THAT A CONSENT WOULD BE REQUIRED TO EXTEND TIMELINES THIS WOULD ADD ADDITIONAL COSTS COMPOUNDING THE PROBLEM.	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below  As an alternative I propose

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

Provision	I support/ oppose/ and for each whether or not you wish to amend	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below
<p>RESTRICTING LAND USE CHANGE. ABOUT LAND USE CHANGE PAGES 15-16. POLICY 6. RULE 3 11.5.7.</p>	<p>The reasons for this are: WISH TO AMEND. REASONS. - I'M NOT CERTAIN WHY THERE NEEDS TO BE RULES CONTROLLING CHANGES TO LAND USE RULES WITH THE EXCEPTION OF FORESTRY TO FARMING. EACH PROPERTY IS REQUIRED TO HAVE A F.E.P. WHICH EFFECTIVELY CAPS OR REDUCES DISCHARGE OF THE H CONTAMINANTS OVER THE LIFE OF P.R. - THE RULES WILL DISTORT THE PROPERTY MARKET. THOSE WITH LOW N LOSSES WILL BE DISADVANTAGED COMPARED TO THOSE WITH H N LOSSES ALLOWING THEM TO MORE OPPORTUNITY TO EXPAND THEIR LAND HEADINGS. - IF DURING THE LIFE OF P.R. TECHNOLOGIES ARE DEVELOPED TO REDUCE N LEACHING, AND ITS LIKELY THAT WILL HAPPEN, THE RULES WILL BE THE CATALYST FOR EXPANSION OF DAIRY SUPPORT INTO SHEEP AND BEEF AREAS - UNDER THE RULES LAND USE IS LOCKED IN IF A LANDOWNER CHANGES FROM FARMING TO FORESTRY - WHILE THE WIDER PUBLIC MAY WISH TO SEE TIGHTER CONTROLS ON LAND USE CHANGE ITS LIKELY THE PERVERSE EFFECTS WILL OUTWEIGH ANY BENEFITS.</p>	<p>As an alternative I propose  I SEEK TO AMEND RULE 3 11.5.7 TO REFER TO JUST CHANGES FROM WOODY VEGETATION TO FARMING ACTIVITIES. ALL OTHER CHANGES BE DELETED.</p>

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Provision	I support/ oppose/ and for each whether or not you wish to amend	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below
<p>THE INCEPTION OF A SUBCATCHMENT MANAGEMENT MODEL.</p> <p>OBJECTIVE 3</p> <p>Policy 9.</p> <p>IMPLEMENTATION METHODS 3.11.4.5 TO 3.11.4.12</p>	<p>The reasons for this are:</p> <p>SUPPORT WITH ADDITION.</p> <p>REASONS</p> <p>- A SUBCATCHMENT MODEL IS AN EXTENSION OF THE F.E.P. CONTAMINANTS ARE MANAGED AT THEIR SOURCE.</p> <p>- IT WILL IMPROVE FARMER UNDERSTANDING OF THE WATER QUANTITY PROBLEMS AFFECTING THEIR OWN SUBCATCHMENT.</p> <p>- IT ACCOMMODATES ACROSS BOUNDARY INITIATIVES.</p> <p>- IT OVERCOMES <del>CONCERN</del> CONCERN THAT FARMERS IN ONE SUBCATCHMENT ARE HAVING TO OFFSET CONTAMINANT LOSSES IN ANOTHER SUBCATCHMENT</p> <p>- REGIONAL COUNCIL HAS AN IMPORTANT ROLE OF SUPPORTING THESE IN A SUBCATCHMENT AS OPPOSE TO JUST POLICING THEM</p>	<p>As an alternative I propose</p> <p>I Propose</p> <p>ADD TO 3.11.4.6 - PROVIDE STAFF RESOURCES AND LEADERSHIP TO ESTABLISH AND SUPPORT SUBCATCHMENT MANAGEMENT GROUPS.</p>



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