

**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

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Greenplan holdings Ltd has extensive land holdings (some 7,500 Ha's) throughout the Waikato and King Country Regions. Most of these properties are subjected to a Forest Right which enables partnerships to grow forests on the land. Most of this land is predominantly forest land with some small leased grazing blocks.

The specific provisions of the proposal that this submission relates to and the decisions it seeks from council are as detailed in the following table. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan, including objectives, policies, or other rules, or restructuring of the plan, or parts thereof, to give effect to the relief sought

We thank you for your time in considering our concerns and suggested changes, to the current healthy river plan change 1.

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 do not wish to be heard in support of this submission.



Signature

7.3.17
date

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<p>Objective 1 – Long Term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit.</p>	<p>support this objective 1 with amendments</p>	<p>We support this objective, but have concerns on how realistic some of the aspirations of the plan are and the effects that this will have on our business, now and in the future through the uncertainty that this plan change gives</p> <p>We have concerns that the science behind this objective is not robust enough and rather visionary in their views</p>	<p>We seek that there is more science based evidence to ensure that these aspirations are actually achievable.</p>
<p>Objective 2 – Social, economic and cultural wellbeing is maintained in the long term.</p>	<p>support this objective 2</p>	<p>We support this objective, We believe it is important to maintain strong social, economic and cultural wellbeing for all.</p>	
<p>Objective 4 – People and community resilience</p>	<p>support this objective 4</p>	<p>We support this objective, People make up communities, if livelihoods and incomes are threatened people move away, so do businesses and communities disappear.</p>	

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<p>Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens</p> <p>And any consequential amendments arising from this submission point</p>	<p>support policy 1 with amendments</p>	<ul style="list-style-type: none"> • Impractical and too costly on some farms when looking at section C • Timeframe Under current plan too tight. • Currently lacks evidence based detail for landowners to feel assured that the work and money they put into managing this diffuse will give effect to the long term health of the rivers. 	<p>We seek that the provision is amended with the following as an alternative</p> <ul style="list-style-type: none"> • Follow national stock exclusion policy • Timelines are adjusted to be more practical in their approach. • Identify point source through targeted, evidence based data and work to reduce or mitigate it over time through better management practices.
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<p>Policy 2 Tailored approach to reducing diffuse discharges from farming activities</p> <p>Section C : establish a nitrogen reference point (NRP)</p> <p>Section E : Stock Exclusion to be completed in 3yrs following the dates by which a farm environment plan must be provided to the council, or in any case not later than 1 July 2026 Pg30</p> <p>And any consequential amendments arising from this submission point</p>	<p>We support with amendments to policy 2 section C and E.</p>	<ul style="list-style-type: none"> • Have a tailored approach to all contaminants, using evidence based data to support this concept. • Section C NRP established promotes a grand parenting approach, penalizes low emitters and uses them to offset high emitters with little or no compensation. • NRP hasn't helped Canterbury there is still the issue, placed communities against each other due to grand parenting approach • Section E; stock exclusion, too tight a timeframe for some, expensive and in some areas impractical, whereas, good management practices could overcome this issue, placing that in your farm plan could highlight the ways around it through other mitigating ways. 	<p>We Seek amendments to Policy 2 section C and E to be removed and replaced with:</p> <ul style="list-style-type: none"> • The stock exclusion requirements are based around a national standard ruling. • That all contaminants are treated the same • Using data from sub catchment approach which identifies relevant or significant areas that are causing the problem. • Work through farm environment plans to help reduce this discharge. • Collect data to see what does exist and deal with that, create flexibility during this process to ensure business and communities aren't economically restricted and unviable.
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<p>Policy 5: Staged approach</p>	<p>We support a staged approach with amendments</p>	<p>We seek that the provision is amended to focus on allowing better flexibility along the way while creating strong evidence based data,</p> <p>Further assessment on whether the quality and attributes in table 3.11-1 pg 57- 67 are realistic and achievable.</p> <p>Attributes and quality need to be realistic to ensure that a holistic approach to the regions are maintained for the long term</p> <p>This plan currently gives uncertainty with costly, impractical rules for landowners to follow yet gives little or no evidence that these costly rules will give effect to the vision and strategy long term.</p>	<ul style="list-style-type: none"> • Create sub-catchment plans to help identify priority areas and the point of contaminant source and what the true problem is. • Then WRC works with landowners and the community to help implement positive change to that issue that has been truly identified, not suggested. • Make the plan and changes evidence based.
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<p>Policy 6: Restricting land use change.</p> <p>Rule 3.11.5.7 Non Complying Activity Rule Land use change</p> <p>Section 1 Woody vegetation to farming activities and any consequential amendments arising from this submission point</p>	<p>We strongly oppose this policy</p>	<ul style="list-style-type: none"> • We strongly oppose this provision based on the approach of restricting land use change, is a form of grand parenting. • This approach disadvantages the low emitters while using them to help offset higher emitters. • This policy 6 and rule 3.11.5.7 will reduce land values, all land that is currently under forestry will have no alternative potential in the future, effectively locking that land into being only used for forestry and being used to offset higher emitters with no compensation in doing so. • Those landowners that have forest rights over there land will be penalized and unable to diversify their land use overtime, effectively those landowners with low emitting practices are being used to offset higher emitting landowners with no compensation • Reduces in land value and limited borrowing ability. • Landowners that have higher emitting systems are rewarded with higher land values and this will increase as this type of land will be limited. Overtime rewarding historical high emitting practices 	<p>We seek that this provision is amended to allow for greater flexibility for landowners</p> <ul style="list-style-type: none"> • We seek that positive land use change is encouraged that will help support and grow rural regions for continue growth in the future. • Amend blanket rule approach as they limit flexibility , and stifles community growth and development • Create Compensation to land owners if implemented.
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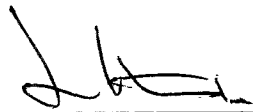
<p>Rule 3.11.5.2</p> <p>Sec 4A schedule B Nitrogen reference point</p> <p>And any other consequential amendments arising from this submission point</p>	<p>We strongly oppose this policy</p>	<p>We oppose this rule due to the fact it</p> <ul style="list-style-type: none"> • Promotes disharmony amongst different industry groups • Restricts generational change and development long term. Especially for undeveloped land with low NRP • Promotes a grand parenting approach, those with low emitting land are offsetting those with high emitting land • Low emitters are penalized, with no compensation • Places one contaminants at a higher importance level than others, where in some regions sediment and e coli are the bigger issue. 	<ul style="list-style-type: none"> • We seek that this provision is deleted in its entirety and that all contaminants are treated with the same level of importance in a catchment approach.
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All of the above provisions			We seek that in relation to all of the above topics any consequences and or similar amendments to have the same effects

Yours sincerely

Jonathan Barton



7.3.17

Signature

Date