

**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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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. If others make similar submissions, I would consider presenting a joint case with them at the hearing.

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Anthony Darke

8th March 17

Signature

date

Adana Darke

8th March 17

Signature

date

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Introduction

Thank you for the opportunity to submit on the Waikato Regional Councils proposed Plan Change 1.

We are a farming family, farming outside the Waikato/Waipā catchment; however we are concerned about the effects on our local communities and towns; and the potential for this plan to set a precedent for our catchment (Aria/Mokau).

We have just purchased our farm from Anthony's parents, which has been run relatively conservatively. We are now in the process of putting in place an intensive bull system on a portion of the farm, and in doing so we are fencing off riparian strips and planting poplar poles etc. There are many young farmers in our situation, and grandparenting in particular will severely limit our farming careers.

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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.

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
<i>The partial withdrawal of PC1</i>	Oppose	Any Plan Change needs to apply to the entire catchment to be fair, significant, and effective.	The Plan should be withdrawn until the entire catchment can be considered under the same Plan Change.
<i>Objective 1 and Table 3.11-1 and any consequential amendments arising from this submission point.</i>	Support with amendments	<p>We support Objective 1 in that we need to protect our fresh waterways for the future. We farm an intergenerational farm and want our family to be able to enjoy the rivers and streams like we do and have always done.</p> <p>We are concerned that the objective and targets are too idealistic, and don't fully consider the changed environment we live in which includes pests, roads, dams, people etc. The extent of restoration is at odds with other objectives i.e. social, economic.</p>	<p>Objective 1 – The word 'Restoration' is deleted, as this leads to an expectation that the river will be returned to its original state.</p> <p>Table 3.11-1 – targets are amended to be more achievable and less detrimental to social and economic factors.</p>

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
<i>Objective 2</i>	Support with amendments	<p>Absolutely support this, but find it very difficult to see how this can be achieved via this plan. We believe the implementation of the plan in its existing form is going to be a massive cost to sheep and beef farmers in particular, rendering many inviable. Profitability is already squeezed in the sector. Reduced profitability will filter out into our communities through reduced spending; reduced staff; fewer children at rural schools etc. More forestation will reduce work for many in our rural towns who support our industry – i.e. the several meat works, shearers, and rural supplies companies. Te Kuiti is reliant on this industry to stay afloat.</p>	<p>Amend the Plan to take into better account the cultural and social impact of the plan change.</p> <p>Restore the balance in the Plan between needing the rivers to be pristine, and needing a viable and resilient rural sector.</p>
<i>Objective 4</i>	Support with amendments	<p>Under the current 10 year plan change we have very little understanding of how the plan is going to change going forward. This means we don't have the confidence to do things like plant trees. For example, if we plant a forest now, are we actually going to be able to harvest it in 30 years' time, or will the 2nd and 3rd Plan Change have changed the rules so that we can't?</p> <p>Objective 4 seeks to ensure that the cost is spread over 80 years, however there are some really short timeframes for those needing to do a lot of stock fencing and reticulation which would likely tip many of these businesses over.</p>	<p>Amend to give more security around decisions we make today. This Plan does not provide any certainty for farming for the future.</p> <p>Amend to give more time for farmers to implement some of the changes.</p>

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3.11.4.2	Support with amendments	Monitoring this plan looks set to create a whole industry of its own. We are concerned about the lack of expertise and number of people that really understand farm systems that will be monitoring this. We are also concerned about the amount of money this will all cost, and who will pay for it. We are already paying an exorbitant level of rates and the cost of compliance is becoming a real burden to our businesses.	Application of rules needs to be low cost and with limited bureaucracy.
3.11.4.5	Support	Sub-catchment approach is a very sensible idea, and much more likely to result in positive change than a generic 'one size fits all' Plan.	Retain
<i>Rule 3.11.5.1 Small and Low Intensity Farming Activities</i>	Oppose	Including these small farms in the Plan Change will result in massive cost to monitor, including significant cost to the landholder for Farm Environment Plans etc.	Amend to increase to an area of 20ha, and increase Stock unit to 20/ha to provide flexibility throughout the year.
<i>Schedule B – N Reference Point and all other points in the Plan Change relating to the N Reference Point and any other consequential amendments arising from this submission point.</i>	Oppose	<p>The N reference point (grandparenting) is an unfair way of mitigating N in the waterways. Low emitters of N are effectively subsidising the polluters.</p> <p>We have taken on a conservatively run farm. The reality for us is if we are made to hold the N loss rate, we will not be able to continue our business as it is not profitable. Intergenerational family farming will come to an end - presently the avg. age of farmers is about 58 – for the younger generation to take on these conservatively run farms, they need to increase production, and pay off debt. A lot of these dry stock farms are presently running at very low N loss rates, and will be effectively stuck in time.</p>	<p>Withdraw the N Reference Point for Dry Stock farmers. Focus of a Natural Capital or land use capability.</p> <p>The Plan needs to be more specific and targeted to each sub catchment, with control of particular contaminants relevant to that water body.</p> <p>The creation and implementation of the plan should be managed locally, with the use of Farm Environment Plans.</p>

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		<p>Importantly N is not a big problem for most dry stock farmers. We need to focus on other areas like sediment, so why lump the N problem on us, and take away our flexibility and opportunity to return our farms to viable businesses. We need to maintain or increase profitability to implement the strategies that will mitigate our specific contaminants.</p> <p>Dry stock farms traditionally have a flexible N loss rate as they change stock policies to follow markets, grass growth and other factors.</p> <p>The two years given as reference years were drought years, and we are still rebuilding our stock numbers.</p>	
<i>The use of OVERSEER</i>	Oppose	<p>OVERSEER was not designed to be a regulatory tool. Multiple users can come out with entirely different N loss rates using the same data, therefore how can N loss rates be kept relative across thousands of properties.</p> <p>Using OVERSEER defaults for stock weights will lead to N loss rates being under or over stated, and therefore useless.</p> <p>People will naturally try to 'work' the system with this kind of approach and we will see anti-environment practices. It will also mean that higher emitters have no reason to change their practices.</p>	<p>Withdraw the N Reference point, and replace with a Land Use Capability type approach. Manage through Farm Environment Plans.</p> <p>Support the reduction of the top75% emitters.</p>
<i>Schedule C – Stock Exclusion</i>	Oppose in part	Where cattle are farmed extensively on hill country it will be a major cost to reticulate water	More science needed.

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		and fence off the waterways – some have forecasted around \$1,500/ha. There doesn't appear to be science around the contaminant load from farms that are extensively grazed in this way. The science needs to be strong to justify such a large expense.	Alternative measures other than stock fencing need to be considered on hill country – this can be done through the FEP i.e. only grazing with cattle at certain times of the year etc.
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Yours sincerely,

Adana and Anthony Darke

8th March 2017

Signature

Date