

Submission

**Waikato Regional Council Proposed Waikato Regional Plan Change 1
Waikato and Waipa River Catchments.**

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

On: The Waikato Regional Council's proposed Waikato Regional Plan Change 1 –
Waikato and Waipa River Catchments

To: Waikato Regional Councils
401 Grey Street
Hamilton East
Private Bag 3038
Waikato Mail Center
Hamilton 3240

Full Name: Anthony James Peacocke
Phone(Hm): 078784957
Phone(Mob): 0220345839
Postal address: 28 Tutu Road
RD7
Te Kuiti 3987
Email: rmpeacocke@yahoo.co.nz

I am not a direct trade competitor for the purposes of the submission but the proposed plan has a direct impact on farming and our local economy. 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.



Signature

7/3/2017

Date

Provision: Schedule C - Stock Exclusion.

I oppose Schedule C - Stock Exclusion.

The reasons for this are:

There are streams that are very difficult and therefore prohibitively expensive to fence off. Fencing off all streams and rivers that can be reasonably fenced will have a massive positive impact on waterway health. The ideal of also fencing off the very difficult and expensive minor streams in steeper country will severely cripple the business of numerous farmers and subsequently have major negative impacts on the local economies and communities of sheep and beef farmers.

I seek that the provision is amended as set out below:

I propose that streams that would be very difficult and expensive to fence are not required to be fenced off. This would avoid the significant negative impacts of aiming for the ideal that all streams be fenced off and we would still have a near maximum positive effect overall.



2 examples of minor streams that would be very difficult and expensive to fence off while having a relatively insignificant impact on the overall desired outcome of clean healthy rivers.

Provision: Schedule B – Nitrogen Reference Point

I oppose Schedule B - Nitrogen Reference Point

The reasons for this are:

It is unfair and makes no sense to base the maximum allowed intensity of a farming system on recent actual intensity of a farming system.

The Nitrogen Reference Point plan put forward in Plan Change 1 is not a good proposal.

It is not fair to reward those with currently high nitrogen losses with a high future nitrogen loss limit and penalise those with currently low nitrogen losses with a low future nitrogen loss limit. This unfairly penalises those with current low nitrogen losses by way of lost potential income, lost potential land improvement and a lowering of their land values resulting in significant negative impacts to individuals lives plus flow on negatives to local communities.

Cropping provides several functions on a farm one of which is development and improvement of pasture and therefore profitability and viability of the land. This development is long term and often intermittent as opportunities, finances and the environment allows. To limit a farms future cropping abilities based on what has been done over a specific several year period shows a complete lack of understanding of the flexibility that is needed in the long term development and improvement of a farm. This development is directed by the flows of the weather, environment, produce markets and financial markets. This one dimensional limitation on land development will also severely limit funds that can be used to protect the environment.

It is commonly accepted that Overseer can produce margins of error of 20-30 percent*. To use Overseer as a tool to estimate nitrogen losses for a farm, then use that estimate to put limitations on how the land can be farmed is an irresponsible approach. The imposed limitations which can have major impacts on the income, development and stability of a farm business will also have broader and far reaching impacts on the local people and communities of small rural towns that support the sheep and beef farming industry. This will go against “Objective 2” of PC1 to maintain cultural, social and economic wellbeing. Negative economic impacts on a town that supports the sheep and beef industry will also cause negative social and cultural impacts as jobs are lost and people have to move elsewhere to make a living. What these towns really need is economic stimulus to encourage people back in order to thrive once again.

*** Overseer margin of error sourced from parliaments website**

https://www.parliament.nz/resource/ennz/51DBSCH_SCR68054_1/01001b086f8b48ecc6a923322b27707caba0d13b

I seek that the provision is deleted in its entirety and replaced with a new provision that takes steps to reduce nitrogen losses, measures the actual affect of those steps and is fair to all farms:

Overseer should not be used to obtain theoretical estimates of a farms nitrogen loss.

Some simple but effective measures could be taken to reduce intensity of the heavy polluters. The use of feed imported from outside of New Zealand could be banned in the Waikato. Not allowing palm kernel to be fed to cattle would be a clear and simple step to lower the intensity of heavily stocked farms. This could be extended to all feed needing to be grown on the farm except in adverse conditions such severe as droughts. These are natural limitations set by what the farm can actually provide and produce rather than based on theoretical estimates.

Whatever the system used to set limitations, the limitations should be allocated to different farms in a fair manner. I propose that limitations on nutrient losses and therefore farm inputs should be allocated as per classes of land. A sheep and beef farmer that currently has low nitrogen losses with the same class of land as a dairy farmer that currently has high nitrogen losses should get the same limitations allocated to his land as the dairy farmer. A farm with 2 or 3 classes of land should have each of those classes assessed separately. This would be fair to all farms and individuals and would have a better result environmentally due to stronger limitations on the most intense farming.

Provision: Objective 2 – Maintain cultural, social and economic wellbeing of local communities.

The towns that support the sheep and beef industry will take a significant negative impact on their economies under the proposed Plan Change 1. This will not help maintain cultural, social and economic wellbeing for these towns.

Plan Change 1 in its current form will fail in meeting Objective 2 for communities and towns that support the sheep and beef industry.