

**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  
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*Complete the following*

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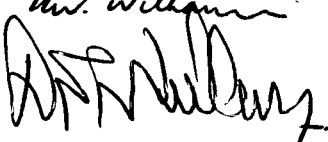
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I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

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

Signature *Mr. Williamson* date *15th March 2017*  
 *1-3-2017*

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

## Introduction

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

- We are Don and Robyn Williamson farming sheep and beef in the Owhiro Valley South side of the Kawhia Harbour. This district is in the Western Catchment Zone neighbouring the Waikato/Waipā catchment
- Farming career spans 25 years; local community activities are an integral part of our lives. We have brought up 2 adult children, now adults, who frequently come home to the coast.
- **Farm Specifications:**  
265 ha of medium hill-country – two separate blocks.  
Broken into 20% hay-country; 50% medium hill ( -15 deg) ; 30% steeper (+25 deg)  
50/50 sheep & beef
- Completed LEP (Land & Environment Plan) level 1 in 2014 and level 2 in 2016  
Working through mitigations as per plan including poplar planting on identified erosion prone slopes; additional water reticulation and fencing off of main stream.
- Have colleagues and relatives farming in the Healthy Rivers Catchment – we are very concerned for them and the future of sheep and beef farming in this region and the social impact on our local communities.

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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.

Specifically what objective, policy, rule, map, glossary, or issue you are referring to	My submission is that: Support or oppose and reasons	Decision I would like WRC to make is:
<p><b>Vision &amp; Strategy: Take Mahinga-kai and swim in the Waikato/Waipā Rivers</b></p>	<p>Support with amendments</p> <p>We support the Vision &amp; Strategy of the Healthy Rivers Wai-Ora Plan however:</p> <ul style="list-style-type: none"> <li>• The severe nature of PC1 Plan Rules: 3.11.5.2 and 3.11.5.4. will constrain objectives 2 and 4 making them unattainable to many</li> </ul>	<p>I would like the WRC to work with farmers to form a long-term Plan that achieves the Vision &amp; Strategy:</p> <ul style="list-style-type: none"> <li>• re-visit the interpretation, including numerical interpretation through Table 3.11-1, of the V &amp; S, and amend to ensure that the numerical parameters are achievable while giving effect to the V&amp;S</li> <li>• Amend PC1 so that the plan has realistic achievable goals</li> <li>• Amend PC1 so that the plan gives farmers confidence to invest and encourages young people into the sector</li> </ul>
<p><b>3.11.2.2 Objective 2</b></p> <p><b>Objective 2:</b> Social, economic and cultural well-being is maintained long-term</p>	<p>Support with amendments</p> <p>We support Objective 2 in principle however:</p> <ul style="list-style-type: none"> <li>• Enforcement of Rule: 3.11.5.2 &amp; 3.11.5.4 will see large tracts of farm land lost to trees/bush, leading to depopulation</li> </ul>	<p>Amend Objective 2 so that it is made explicit that the objective is to enable people and communities to continue to provide for their social, economic, and cultural wellbeing, and to provide for future generations.</p> <p>The first section of Objective 2 <i>“Waikato and Waipā communities and their economy</i></p>

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	<p>within our communities, and the direct contradiction of <b>Objective 3.11.2.2</b></p> <ul style="list-style-type: none"> <li>• Whilst we value re-forestation opportunities, there is a real finality in the monocultural planting of large areas. Future generations could be economically compromised as innovative hill-country crops of the future, become available.</li> </ul>	<p><i>benefit from the restoration and protection of water quality in the Waikato River catchment” as currently proposed fits more appropriately within Objective 1. Delete this section from Objective 2 and instead include within Objective 1.</i></p> <p><b>Amend PC1 so that it adopts a sub catchment approach to managing land use and water quality tailored to the specific issues faced by the sub-catchment, and a 30 year time frame for achievement of its objectives. The first period to a 30-year initial Plan should provide communities and individuals with certainty in relation to what will be required of them and to enable sound business, succession, and investment decision to be made, including investment into environmental mitigation.</b></p> <ul style="list-style-type: none"> <li>• Needs to have targets and goals that are achievable with current technologies and 15-year review to ensure plan is on-track and assess the health of local communities</li> </ul>
<p><b>3.11.2.4 Objective 4</b></p> <p><b>Objective 4</b> People and community resilience</p>	<p>Oppose</p> <p>We support objective 4 in relation to providing for People and community resilience, however as currently proposed the objective fails to provide for this outcome because it recognises that as</p>	<p>Include a new Objective which provides for People and Community resilience, adaptive management, and sub catchment approaches lead by communities.</p>

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	<p>currently proposed PC1 will not achieve its objectives and further plan changes including increasing stringency of land use controls will be required (Objective 4b). The outcome is a plan which fails to provide communities and individual’s certainty about what will be required of them in the future, and which fails to ensure people and community resilience.</p> <p>The plan fails to provide a pathway for individual and communities to work together to achieve the V&amp;S</p> <p>Enforcement of 3.11.5.4 and 3.11.5.2 will reduce farm profits, land values and community viability; making objective 4 “ People and community resilience” unachievable.</p> <ul style="list-style-type: none"> <li>• Sheep and beef production will be frozen, but farm costs will increase</li> <li>• With land values decreasing farmer ability to borrow will reduce</li> <li>• Our community will suffer through depopulation and reduced services</li> </ul>	<p>Delete reference to the staged approach and future plan changes including increasing stringency in land use controls and requirements.</p>
<p><b>Policy 4:</b> <i>Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future</i></p>	<p>Support with amendments</p> <ul style="list-style-type: none"> <li>• Support the intent of policy 4 to enable activities with lower discharges to continue or to be established;</li> </ul>	<p>Amend Policy 4 so that it enables small scale land uses, low intensity, and low risk land uses including forestry and farming to continue, to be flexible, and to be established.</p>

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	<ul style="list-style-type: none"> <li>• However as currently proposed and reflected in the rules this aspect of policy 4 is not achieved;</li> <li>• The nature of Policy 4 creates future <b>uncertainty</b> to invest in our farming businesses</li> <li>• To comply with rule 3.11.5.4 on our farm the costs would be prohibitive and counter-productive if we were eventually required, after 10 years, to retire this land.</li> <li>• Further uncertainty if say pine trees are planted on our farm, and then after 20 years harvesting is non-compliant</li> </ul>	<p>Delete reference to further reductions in contaminate discharges.</p> <p>Ensure that existing biodiversity values of these land uses are recognised and that further establishment and protection of biodiversity is enabled and incentivised. This also provides management benefits Green House Gas Emissions in relation to climate change.</p>
<p><b>Rules 3.11.5.1 and 3.11.5.2</b></p>	<p><i>Oppose</i></p> <p><i>As proposed rules 3.11.5.1 and 3.11.5.2 fail to provide for low intensity and low risk land uses and fail to provide flexibility for these land uses.</i></p> <p><i>We seek that the rules permitting low intensity land uses and other land uses be amended so that they are consistent with policy 4, and actually provide for small, and low intensity, and low risk farming activities to be enabled. This includes ability to continue if existing, be established, and enabled to be flexible.</i></p>	<p><i>Amend rules 3.11.5.1, and 3.11.5.2:</i></p> <ol style="list-style-type: none"> <li><i>1. Incorporate into one rule</i></li> <li><i>2. Amend to include as Permitted Activity land uses with stocking rates at or below 18 stock units and enable stocking rate to increase from current up to this standard, but only if land capability is suitable</i></li> <li><i>3. Relate to soil and geology ie LUC I, II, III 20 stock units; LUC IV, V 18 stock units; LUC VI, VII 10 stock units, or andDelete 6 stock unit standard</i></li> <li><i>4. Delete 4.1 hectares and provide for up to 20 hectares</i></li> </ol>

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		<p>5. Apply national stock exclusion requirements which relate to exclusion of cattle, deer, and pigs, from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier, or other technologies) on flat land and rolling land, but not hill country</p> <p>6. Enable flexibility in land use, discharges, and stocking rates up to these standards</p> <p>7. Delete any standards or clauses which hold land uses to historic discharge levels or stocking rates</p> <p>8. Delete standard 4c Rule 3.11.5.2</p> <p>9. Amend riparian setback distances so they only apply to flat and rolling land and not hill country (ie slope <math>\geq 15</math> degrees)</p>
<p><b>Rule: 3.11.5.2</b>  <i>Nitrogen leaching grand-parented to the highest annual loss rate calculated for 2014/15 or 2015/16 and must be no greater than 15kg/N/ha/yr</i></p> <p><b>Rule 3.11.5.4, Schedule B, Schedule 1</b>  <i>Application of the Nitrogen Reference Point (NRP) - Nitrogen leaching grand-parented to the highest annual loss rate calculated for 2014/15 or 2015/16</i></p>	<p>Oppose</p> <p>We oppose a cap on Nitrogen and the reasons are:</p> <ul style="list-style-type: none"> <li>• N caps will hinder the extensive farmer from reaching his land capability potential.</li> <li>• This is unfair and may reduce land values.</li> <li>• On our farm we need flexibility within stock class eg: the ability to adjust sheep to cattle ratios as market forces and or climate extremes dictate.</li> </ul>	<p>We would like to see the Nitrogen Reference cap removed. And an alternative as follows: and a sub-Catchment Planned approach be introduced using the LEP (Land and Environment Plans) as a monitoring tool. Benefits of this as listed below:</p> <ul style="list-style-type: none"> <li>• farm has individual base discharge allowance set</li> <li>• Excessive nutrient discharge must be reduced in line with soils capability</li> <li>• Setting catchment goals and individual farm goals to enhance aquatic ecosystems</li> </ul>

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<p><i>In all other areas in PC1 which refer to this we oppose</i></p>	<ul style="list-style-type: none"> <li>• As Drystock farmers we contribute more to sediment run-off and this has been and should continue to be our main focus for mitigation. The ability to retire some steep land from pasture and off-set this with some intensification of flat land.</li> <li>• Does not take into account or reward investment in biodiversity including mitigation of green-house gases</li> </ul>	<ul style="list-style-type: none"> <li>• Mitigation options with achievable timeframes to match land intensity</li> </ul>
<p><b>Rule: 3.11.5.2, 3.11.5.4, Schedule 1, Schedule C</b>  <b>Stock excluded from all permanently flowing water-bodies, wetlands and lakes by date specified in Schedule C and the FEP</b></p>	<p>Oppose</p> <p>We agree that cattle/deer/pigs should be excluded from water bodies up to 15 degrees, and where farming is intensive -16-18 stock units/ha +</p> <p>We don't agree to physically fence stock from flowing water-bodies over 15 degrees and the reasons are as follows:</p> <ul style="list-style-type: none"> <li>• Cost is prohibitive for minimal benefit – water reticulation + fencing of our farm land area over 15 degrees \$100,000 + .. a farm carrying 8 stock units/per hectare</li> <li>• Large machinery required to clear a line for mechanical post driver – creates more erosion and sediment for little or no reduction of N</li> <li>• Some of our paddocks are large and contain a variety of contour eg: some at</li> </ul>	<p>Use of LEP (Land and Environment Plan) - farmer classifies his farm into LMU (land Management Units) and formulates his goals to protect waterways. Farmer is held to his individual farm goals/timelines/budget which feed into the Sub-catchment goals.</p> <p>Using LEP there are many management mitigations that can be utilised as follows:</p> <ul style="list-style-type: none"> <li>• Avoidance of farming older cattle on slopes in winter or when wet</li> <li>• Farm cattle extensively on slopes</li> <li>• Fence off swamps/plant-out this to provide silt traps to remove sediment</li> <li>• Construction of sediment traps up near the headwaters to help slow flow and trap sediment</li> </ul>



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	<p>15 degrees and very good grazing land and other parts steeper over 25 deg. However, partial fencing of paddocks is in-practical once you add in reticulation costs</p> <ul style="list-style-type: none"> <li>• On-going cost of maintenance – fence repairs/weed control in difficult terrain</li> </ul>	<ul style="list-style-type: none"> <li>• Plant shade trees away from Waterway to discourage stock camps/nutrient build-up</li> <li>• Use of temporary electric fencing where/when it is necessary</li> <li>• Planting poplar poles on erosion prone slopes</li> <li>• Suitable Units maybe identified for Pine tree planting, but this decision should be well planned and left to farmer discretion.</li> </ul>
<p><b>Plan Change 1</b></p> <p><b>Section 32 analysis</b></p>	<p>Oppose</p> <p>Plan Change 1 as proposed fails to achieve the purpose of the RMA and fails to achieve the Vision and Strategy for the Waikato River.</p> <p>The WRC has not given effect to the requirement to undertake a s32 analysis and show that this plan is the most effective and efficient means of achieving its objectives and the purpose of the RMA</p> <p>Alternative provisions which I have recommended (Sub-catchment approach) have not been assessed</p> <p>The WRC has withdrawn a large section of PC1, meaning that they cannot assess the provisions of this catchment in relation to achieving</p>	<p>Delete the plan in its entirety</p> <p>I would like the WRC to produce a cost/benefit analysis of the long term (at least 50 years) economic and social effects of the PC1 Plan on drystock farms and communities. This should be peer reviewed.</p>

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	<p>integrated catchment management and the objectives of this plan.</p> <p>The costs to land owners and impacts on communities have not been adequately assessed</p>	
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