

**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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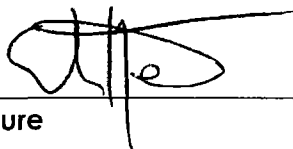
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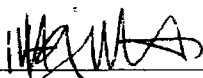
**Postcode:** 3285

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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.**

	5.3.17
Signature	date

	5.3.17
Signature	date

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## 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 sheep and beef farmers in the Te Pahu in the priority two Kaniwhaniwha catchment. We farm the head waters of the kaniwhaniwha stream.

We own or have shares in 3 different properties in the Kaniwhaniwha catchment, a third generation 220 ha dairy, a third generation 200 ha dairy support, 150ha drystock property and a 270ha bull beef/dairy support in the Coromandel.

We currently lease the 3 Te Pahu farms to two different entities. The Coromandel farm we run extensively ourselves.

Two of the Te Pahu farms have a fully reticulated water supply. All ponds/dams on these properties have been fenced off and have either been planted or we are in the process of adding riparian planting. The third property was only purchased in May 2016, and we are in negotiations with the Waikato Regional Council to fence, retire and plant certain blocks on all three properties.

Our personal on-farm polices include only running smaller framed stock on the hills during the at-risk periods of the year (e.g. winter, high rainfall events) and soils are managed to avoid pugging.

Between us Elliot and I also operate an agricultural helicopter business and an agribusiness consultancy company.

I am also in partnership with my brother on our third generation 900ha drystock property at Hauturu.

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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:		
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
Objective 1 & Table 3.11-1	Support with amendments	I support the long-term restoration and protection of our waters. However, I am concerned that the table 3.11-1 80 year numerical water quality targets may not be achievable, and possibly not even achievable under pristine conditions	<p>Retain the intent of Objective 1, but amend Table 3.11-1 so that the water quality targets are achievable.</p> <p>Water quality targets, should provide for the values of waterbodies such as ecological health, and cultural values. However they should also be set at numerical states which provide for the social and economic wellbeing of people and communities, and take into account any implications for resource users, including implications for actions, investments, and ongoing management changes.</p> <p>Amend Table 3.11-1 so that the numerical targets do not apply during flood events or when the parameter does not influence the value ie E-coli</p>

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			should apply at times when people swim or primary contact with water is undertaken for cultural reasons.
Objective 2	Support this objective with amendments	<p>I believe maintaining the long-term social, economic, and cultural wellbeing of the Waikato Waipa communities is essential to the survival of our rural and urban communities.</p> <p>I am concerned that the plan does not achieve this, as set out below.</p>	Retain and strengthen the objective in relation to providing for the long-term social, economic, and cultural wellbeing of the Waikato Waipa communities. Including ensuring the economic resilience, sustainability, and vibrancy, of people and communities.
Objective 4  <i>People and community Resilience</i>	Support with amendments	<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. It recognises that as currently proposed PC1 will not achieve its objectives. Further plan changes including increasing stringency of land use controls will be required (Objective 4b). The result of this is that PC1 fails to provide communities and individual's any certainty about their futures and what will be required of them, and it therefor 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 vision and strategy.</p>	<p>Amend the objective so that it provides for People and Community resilience over the life of the plan.</p> <p>Numerical Freshwater objectives should not be set if they are not achievable. The plan should clearly set out how it intends to achieve the 80 year outcomes now to provide certainty for people and communities.</p> <p>Delete clause b. Include a new objective which will provide for community and individual resilience, management processes which allow for adaption, and community lead sub-catchment approaches.</p>

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		<p>Enforcement of 3.11.5.4 and 3.11.5.2 will heavily reduce farm profits, land values and community viability; making objective 4 People and community resilience unattainable.</p> <p>Sheep and beef production will be capped through the NRP, but farm costs will increase substantially with the need for extra fencing and water reticulation, this without bringing inflation into the equation.</p> <p>Land values will decrease as farmers are unable to develop and improve their land in a financially rewarding manner, which means their ability to borrow will reduce,</p> <p>Our community will suffer through depopulation and reduced services.</p>	<p>Delete any reference to the staged approach and future plan changes including increasing stringency in land use control and requirements.</p>
<p><i>Restricting land use change.</i></p> <p><i>Policy 6</i> <i>Rule 3.11.5.7 and any relevant points within the plan</i></p>	<p>I oppose this</p>	<p>It affects the value of our land and impedes any future ability to develop and grow our businesses.</p> <p>On a professional level it affects many of our elder clients and their ability to market their land in the future should it be suitable for dairying, and effectively removes huge amounts of equity, due to drop in value of land</p>	<p>Deleted in its entirety. It would be more appropriate to gauge land capability through the Farm Environment Plans (FEP) than to use a blanket prohibition</p>
<p><i>Nitrogen management application of the Nitrogen Reference Point (NRP) &amp; use of OVERSEER</i></p>	<p>Oppose</p>	<p>I oppose this grandparenting approach (holding users to their Nitrogen Reference Point). The low emitters are being penalised and the polluters may continue to pollute. There is no scientific</p>	<p>We seek that the Nitrogen Reference Point and use of OVERSEER are removed from the plan in their entirety.</p>

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<p><i>Rules 3.11.5.2 to - 3.11.5.7(inclusive) Schedule B and all other areas in PC1 which refer to the Nitrogen Reference Point</i></p>		<p>evidence that a blanket rule for nitrogen restriction will be of any benefit.</p> <p>It penalises the low emitters – who will no longer be able to develop their farms (they may develop their farms but they will be unable to stock them with these rules) to help pay for the cost of mitigating against the other contaminants.</p> <p>I oppose the use of overseer as a means of determining the NRP – it relies on a wide number of assumptions and can vary depending on the information that is entered into it. It was never designed to be used for this purpose.</p> <p>The years chosen to determine the NRP value were drought years, thus stocking rates were very low – this will mean we are restricted to carrying lower numbers of stock (cattle in particular) going forward.</p>	<p>Adopt a sub-catchment approach to addressing contaminants that are relevant to each farm, not a blanket restriction of one particular nutrient that may not even be relevant to the water bodies in that sub-catchment.</p> <p>Use FEP's to determine what would work best on each farm, and science to determine which contaminants are an issue in each sub-catchment.</p> <p>Amend the rules so that they are effects and science based, not based on grandparenting (holding land uses and land users to historic leaching rates, stocking rates, and land uses).</p>
<p><i>3.11.4.5 Sub-catchment scale planning</i></p>	<p>We support this implementation method</p>	<p>This is a sensible and practicable approach to controlling contaminant discharge and gives each farm, and catchment, ownership over their future.</p>	<p>We seek that the plan change should not be implemented until the scientific data around which contaminants are causing water quality decline is available for each sub catchment.</p>
<p><i>Insert new Objectives, Policies, and Rules to enable, support, and incentivise sub</i></p>	<p>Oppose PC1</p>	<p>Sub-catchment approaches to managing land and water resources are a sensible and practicable approach to controlling</p>	<p>Include new or amend existing Objectives, Policies, methods, and rules to enable catchment groups to manage their land and water resources</p>

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<p><i>catchment planning and land and water management</i></p>		<p>contaminant discharge and gives each farm, and catchment, ownership over their future.</p>	<p>to achieve water quality outcomes while providing for their economic and social wellbeing and sustainability</p> <p>We seek that the plan change should not be implemented until the scientific data around which contaminants are causing water quality decline is available for each sub catchment.</p>
<p><i>Stock exclusion</i></p> <p><i>Policy 3, Policy 4, Rule 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.4 and Schedule C</i></p>	<p>I support with amendments</p>	<p>The national waterway accord <u>recommends</u> that slopes up to 15° be fenced, this should also be applied to healthy rivers</p> <p>The National Waterway Accord has a differing definition of what a water body is, which is much more practical and makes much of the plans objectives more achievable. There are many areas of water on our farms that would require fencing under these rules that seem nonsensical as stock never venture near them. Fencing them would be financially crippling and pointless. Our farms either have or are developing comprehensive water reticulation systems which are proven to be a very effective mitigation against water contamination.</p> <p>The geography of much of our land makes the fencing off of waterways extremely difficult if not impossible.</p> <p>All of our farms are either wholly or contain large amounts of land which is classed as 6e and were we to fence all the waterways as defined in PC1,</p>	<p>Change the definition of a waterway to that of the National Water Accord</p> <p>Change the slope requirements to 15° as per the National Water Accord</p> <p>Extend the timelines and give certainty to those of us with land classed as 6+ that we are not wasting our money and resources in fencing it due to the possibility it may be converted to forestry in future plan changes.</p> <p>Let the individual FEP present mitigations against contaminants, relevant to each farm, rather than a blanket approach.</p> <p>Any waterway fencing should be subsidised by Waikato Regional Council</p> <p>Enable stock to enter waterbodies if they are being actively managed across the waterbody and the</p>



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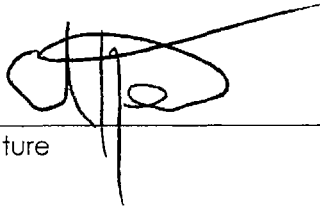
		<p>we have no guarantee that we will not be forced to plant these areas into forestry in future plan changes. The timing required along with the financial input are out of our ability to achieve.</p> <p>This rule does not support objective 2 of the plan as it would be socially devastating for the farming community and the communities and small townships who rely on us.</p> <p>At the time of writing there is no clear understanding of how a slope will be classed</p>	<p>waterbody is not crossed by stock more than 3 x week</p>
<p><i>Removal of northeastern (Hauraki) portion of Plan</i></p>	<p>Oppose</p>	<p>Removal of a significant section of the lower catchment from PC1 means that people are now further unable to determine whether this plan will achieve its objectives and whether the costs on individuals is appropriate.</p>	<p>Place the plan process on hold, or withdraw the plan in its entirety until the lower catchment is re inserted into the plan at which time the plan can be notified as a whole.</p>
<p><i>Farm Environment plans</i>  <i>Policy2, Rules 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.4, 3.11.5.5, 3.11.5.6, 3.11.5.7</i>  <i>Schedule 1</i></p>	<p>Support with amendments</p>	<p>We are concerned that neither our communities nor the Waikato Regional Council have the resources to meet the requirements of a farm environment plan (FEP) in the time frames required as detailed in PC1.</p> <p>There is also a concern that a consent to farm comes with consent conditions, which could add extra, undefinable barriers to our ability to farm, and further undefinable costs to comply.</p>	<p>If an FEP is supplied, Rule 3.11.5.3 should be a permitted activity, not a consented one, regardless of the presence of a certified industry scheme. Remove 'under a Certified Industry Scheme' from this rule.</p> <p>Remove any reference to the Nitrogen referencing point.</p> <p>Extend the time frames to enable compliance.</p>

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			<p>FEP's should allow for mitigation against contaminants, not prescriptive, blanket measures which have no scientific background.</p> <p>We seek that the plan change should not be implemented until the scientific data around which contaminants are causing water quality decline is available for each sub catchment</p>
Policy 16	Oppose	<p>We oppose this policy. The ownership of the land should have no bearing on whether the rules apply or not. The issues addressed in this plan are contaminant discharges and the rules should be the same for all regardless of ownership.</p>	<p>We seek that this policy is removed</p>

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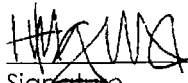
Yours sincerely

A handwritten signature in black ink, consisting of a large, stylized loop followed by a vertical line and a horizontal stroke.

Signature

5.3.17

Date

A handwritten signature in black ink, appearing as a series of overlapping, stylized letters.

Signature

5.3.17

Date