

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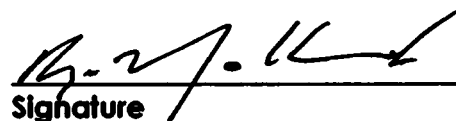
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I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

I wish to be heard in support of this submission.

 6-3-17.
Signature date

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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.'

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

My name is Roger Johnstone and we are sheep and beef farmers. Cattle are dairy bulls which we fatten for market from weaners to specific weight levels. The numbers and size of stock differs over the year as we fatten, sell and replace.

The farm has been in the family for several generations. I have been working on the property for 40 years, and have worked with my father, uncle and brother whom I have bought out over time.

The farm is classed as rolling and steep hill country. We have in recent years developed a reticulated water system for the farm. We have undertaken and developed culvert/crossings and bridges over water ways. Sections of the farm are protected reserves of native bush. We have developed wetlands/dams which are planted. We are and have been conscious of the water quality which we have influence on.



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The specific provision of proposed Plan change 1 that my submission relates to:

Stock Exclusion

I OPPOSE the provision

My submission is that:

The requirement to exclude cattle through permanent fencing is very broad and does not cater for the hill country farms. There is no access by cattle to a number of what are classified as creeks/drains because of the steepness and contour of the land. Further we have reticulated water so the stock have no need and in the case of dairy bull beef no interest or desire to climb down steep faces.

Practically the cost of fencing these steep faces and valleys would be unsustainable and because of the above pointless. Fencing on hill country is expensive anyway. A requirement to fence the gullies with water ways would compromise grazing patterns of stock and creates a danger of smothering in critical areas.

The provision of piped crossings over waterways, coupled with reticulated water, means stock are not compromising water when moved. There is not the necessity for these waterways to be fenced. The Plan fails to take into account the specific nature of the farm, stock type and grazing patterns, and improvements such as reticulated water.

An observation: There is a fenced off creek in the neighbours which was also planted out with a variety of native plants. The farmer was assisted financially to achieve this. Aesthetically this is pleasing however there has been an infestation of noxious weeds eg blackberry. How and who is going to pay for and control this. It is made more difficult with the native planting which will be at risk. Further as the native plants reach maturity what are the implications and impact on the waterway. I suggest it will create barriers to water movement and potential flood risk. Evidence would suggest that the amount of silt going into the waterway is increased because it cannot take its natural course because of the vegetation.

With the increase in noxious weeds it is simply not practical to control such and in steep hill country and over the distances the plan suggests requires fencing, it is financially burdensome. It is not an answer to say that land use should be changed to reflect this difficulty. It is our livelihood and hopefully those of future generations that are impacted.

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Further concerns; Exclusion of cattle from parts of the farm also compromise pasture quality as lead to influx of undesirable grass types. On our property in spring time the cattle are needed to cope with the spring flush. We have combined stock levels ie beef and sheep which has a positive outcome of reducing internal parasite burden.

The decision I would like the Waikato Regional Council to make is:

I believe the provision providing for exclusion of cattle from waterways through permanent fencing should be deleted.

The alternative I propose is that requirements to exclude cattle be tailored on a farm by farm basis to take into account the impact of the nature of the farm eg hill country, the nature and type of stock, work already done eg reticulated water system, piped crossings etc. It is unreasonable and unfair to make generalisations around these factors. Farm environment plans should focus on addressing actual and reasonable risk rather than requiring blanket stock exclusion

The specific provision of proposed Plan change 1 that my submission relates to:

Nitrogen Management

I OPPOSE the provision

My submission is that:

Use of nitrogen is essential to maintain production especially during drought and severe winters. A grandparenting approach based on a two year snapshot is not fair or reasonable. There will be no incentive for farmers with high discharges to reduce and this will penalise farmers who have had previous conservative management, opportunities to change. You will have neighbours with similar country with different limitations. This will put stress on the communities. Farms will be stuck in time.

This has potential to have a large impact on other catchments. Farmers in other catchments will farm to increase their NRP to increase farm values and potential production. This is a perverse outcome and fails to improve freshwater quality.

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Farm requirements are cyclical and influenced by drought and financial considerations. There are a huge variety of soil types requiring various levels of input. The upshot is you cannot make a general rule to fit all.

Obviously if productivity is reduced so is profitability.

The decision I would like the Waikato Regional Council to make is:

Remove the provision in its current form. It is accepted that we need to manage the nitrogen use and impact but there are issues with the recording and accuracy, injustice between farms, failure to take into account the nature of the farm, production and profitability etc. A better understanding of individual farm requirements and overall impact of the whole would inform decisions going forward.

The specific provision of proposed Plan change 1 that my submission relates to:

Conversion from Farming to Forestry could be required to achieve long term goals

I OPPOSE the provision

My submission is that:

This potential creates huge uncertainty for the succession planning on farms. In my case why would my children want to take on a debt to farm in future with a potential to lose your source of income and which would also reduce the value of the asset. The Plan in its entirety creates a huge amount of uncertainty.



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The specific provision of proposed Plan change 1 that my submission relates to:

Restricting land use change

I OPPOSE the provision

My submission is that:

It affects the value of our land and impedes any future ability to develop and grow our businesses. It affects the farmers ability to market their land in the future eg should it be suitable for dairying, and effectively removes huge amounts of equity, due to drop in value of land

Propose

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

SUMMARY

The Plan creates severe uncertainty; compromises succession planning; large financial burden; fails to take into account the specific nature of the properties and the cattle being farmed, the work already done eg reticulated water system, piped crossings, reserves already created; failure to get the mix right on the importance of nitrogen on farm profitability and water quality by the setting of arbitrary historical figures to determine future.


Personally the process and the potential requirements on me and my family if the Plan is introduced has been very stressful. I am a farmer seeking to make a living and to provide for my family in the future as previous generations have done. We recognise water

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quality is of importance and have respected this when making decisions on the farm. We need certainty going forward and the plan does not achieve that

Yours sincerely

ROGER JOHNSON E.


Signature

6-3-17.
Date