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

We were pleased to be able to present in Block 1 to the panel of Commissioners and have requested that the following information be tabled to support our submissions in Blocks 2 and 3.

1. Land Use Change Rules 3.11.5.6 and 3.11.5.7

Our main concern is the increasing disempowerment of farmers to control their use of the land they have paid for and have the responsibility for. We have to run a viable business and with this set of rules (including the Nitrogen reference Point) we have a system where people totally separate from our business are determining how and when we can operate. We are also concerned about the continually increasing costs of compliancy that will come with the monitoring of these land use change rules.

Our previous experience with resource consent applications would indicate that this is not a process that has any concern for the time constraints that season and climate have on such applications, nor are they often dealt with in a time frame that meets the needs of the end user.

We have been part of a Beef and Lamb initiated trial with Overseer and found the process of providing data cumbersome. The results took some months to be available and in the meantime we have been exposed to much conflicting evidence of the validity of the data that it produces. If Overseer use is to be retained as Policy (we hope not) then we very strongly urge that animal weight rather than age is the data that is used in this questionable tool.

Injustice is the greatest demotivator and we need all farmers to feel motivated to reduce nitrogen leaching, e.coli and sediment entering waterways. We strongly believe that whatever system is finally adopted it should be across all farms so that one sector of the farming community is not being favoured over other sectors.

2. Farm Environment Plans

We are opposed to the detail associated with this rule, especially the need for the Plan to be approved by a Certified Farm Environment Planner. Our experience with “off-farm experts” is that they often lack any understanding of some of the practical aspects of working on and with the land. We have always had an undocumented Environment Plan but have over a farming career spanning more than 40 years had to manage the unpredicted effects of both the economy and the climate.

Simply documenting a Plan doesn’t always ensure that it will happen. It needs to be a document that is able to be changed to meet both climatic and economic changes. This should be able to happen without the additional cost of being required to have it approved each time by some external agent.

We are concerned that there is the potential for varying interpretations of the rules around Farm Environment Plans and would want to see Waikato Regional Council provide a low cost appeal process as part of the Plan Change.

3. Stock Exclusion

We estimate that most of our farm has land with a slope of 25 degrees. We are unsure how this will actually be measured. We currently have dams which reduce sediment entry to the stream to some extent. We feel that the one size fits all approach of this aspect of the plan is an insult to those farmers already working on identified risks and doing their best to mitigate them. It also seems a rather underhand way to ensure that there is land available for forestry. The Productivity Commission has had no qualms about going public with the statement that, “It is time for sheep to move over and let pine trees move in.” We are hugely concerned about the environmental impact in thirty years’ time of this mass planting of pines and wonder just how extensive hill country farmers are expected to live in the meantime.

We support the exclusion of stock from waterways but feel strongly that in areas prone to flooding there should be the provision for farmers to achieve this without the expense and often annual risk of losing the fences during flash floods. Stock could be effectively excluded through the use solar powered electric fencing when stock are in paddocks with water ways running through them.