

**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  
401 Grey Street  
Hamilton East  
Private Bag 3038  
Waikato Mail Centre  
HAMILTON 3240**

**Full Name: Jennie Howie & Kelvin Fraei**

**Phone (Work): 07 8778 106**

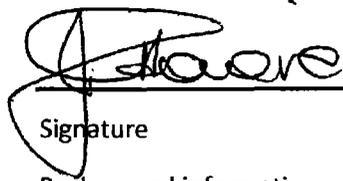
**Phone (Mobile): 0274489496**

**Postal Address: RD 3 Te Kuiti**

**Email: [jennie.rock@gmail.com](mailto:jennie.rock@gmail.com)**

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

I wish to be heard in support of this submission



Signature

7/3/17  
Date

Background information:

We currently own a farm in the Mapiu area situated in the Northern King Country. The property is 200 hectares with 60% being easy contours and 40% being medium hills.

We are both very concerned, as are many of the other drystock farmers in our area at the measures being implemented by the Waikato Regional Council, with the impact being both social and economic. The main concern is with OVERSEER being used and also the restriction of land use change.

We both definitely agree with improving water quality and have fenced off main waterways.

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 effects'. 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 effects to the relief sought.

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The specific provisions my submission relates to are:	My submission:	The reasons for this are:	The decision I would like the Waikato Regional Council to make on this provision is:
Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments	I oppose the plan in its current state	<ul style="list-style-type: none"> <li>The immense uncertainty of the plan for my future and the social, economic future of our community in this sub-catchment</li> </ul>	I seek that the plan in its current state is declined until further amendments are made.
'Variability across the Waikato and Waipa Region' 3 Part A page 14	I support the acknowledgment of variable water quality issues in different region of catchment	<ul style="list-style-type: none"> <li>Each sub-catchment has at least one clear diffuse discharge as their issue above all others. Given the financial issues raise in this submission, perhaps each sub-catchment should focus on that element to resolve first</li> </ul>	I seek that the provision is retained. I also seek that this be focus on in the policy to tailor which region/ sub-catchment's major issue NOT generalised rules or all diffuse discharges i.e. sediment is the major issue, then nitrogen should be omitted from focus
Nitrogen Reference Point Page 15, Page 30 (3.11.3/ Policy 2:c) Page 46 (Schedule B & Table 1) Page 82 (Definition)	I oppose the Nitrogen Reference Point and use of OVERSEER	<ul style="list-style-type: none"> <li><u>Overseer verification</u> – OVERSEER was not designed for the purpose to which the Waikato Regional Plan Change 1 wishes to use it, it was merely as modelling system. There are many known limitations and inaccuracies within the current system. This system has never been proven in every scenario to which it is about to be used, particularly in more extensive steep hill country sheep and beef farming enterprises.</li> <li><u>Financial implication</u> – if this was used and particularly set on only 2 years history, then it would set the price for that property in future sales – again punishing the responsible farmers and rewarding the irresponsible farmers</li> <li>Has it even been scientifically and repeatedly proven and demonstrated that farming, with the primary focus of meat production on hills or steep contours directly attributes to the current water</li> </ul>	I seek that this provision be deleted in its entirety.  As an alternative, I propose the use of Farm Environment Plans or Farm management plans that include the best practice of sheep & beef farming be utilised.

		<p>quality issues? Or is it just the intensive milking platform systems that has attributed to the demise?</p> <ul style="list-style-type: none"> <li>• Current plan <u>punishes</u> the low to medium N dischargers when they are the ones who have been responsible for many years in their use of nitrogen and stocking rates. Low to medium users should be allowed to do the same and never have to lower. Were as high to medium N dischargers should be the only target to reduce to the required standard. Otherwise innocent farmers are punished for good behaviour.</li> <li>• <u>Reference period</u> – Schedule B. f. – set to 2 years. No consideration to the financial or environmental constraints i.e. drought conditions during this period for any farm. There may be significant underlying issues that abnormally affected the stocking rates, fertilizer use and supplement supplied that would have significant influence on the OVERSEER N reference point. Hence, significantly disadvantaging the individual farmer to continue poor financial times</li> <li>• <u>Removes flexibility of farming system</u> – the inability to be flexible with stocking rates and move with the market demands and pasture growth rates will cripple many sheep and beef farming business due to the highly volatile nature of this enterprise. This could significantly impact on the New Zealand economy given the reliance on agriculture</li> <li>• <u>Fertilizer and N use linked to profitability</u> – many Beef &amp; Lamb surveys reveal that higher fertiliser (and nitrogen) users on farms often have higher profitability. Many farms will be at risk of being unprofitable with the combination of reducing fertiliser and stocking rates and the infrastructure cost of fencing and water reticulation.</li> </ul>	
<p>'Reasons for adopting Objective 4' Page 29</p>	<p>I suppose the reasons</p> <p>However I oppose the the necessary due diligence has</p>	<ul style="list-style-type: none"> <li>• There has been no clear indication in the policy of how these expensive changes are going to be meet, hence creating a lot of economic uncertainty for farming businesses and communities alike</li> <li>• Economic uncertainty extended in 4 main areas: <ul style="list-style-type: none"> <li>○ Cost of implementation of the plan on farm over a relatively short time frame. This includes fencing costs, Farm</li> </ul> </li> </ul>	<p>I seek that this provision be investigated further to truly uncover each farm's financial implications before the policy is enforced</p>

	<p>been performed to ensure this is an 'overall costs to people can be sustained'</p>	<p>environment plan costs, water reticulations costs to name a few</p> <ul style="list-style-type: none"> <li>○ Impact on the flexibility required in sheep and beef farming. This significantly impacting in the ability to farm in a manner to maximise market trends, thus to remain a functional business enterprise, one New Zealand relies on heavily economically. To stay viable, sheep and beef farms need to be able to quickly and without hesitation adjust and manipulate stocking rates, stock classes etc to survive. If this aspect of farming was severely limited, then the farmers would rely on the capital growth of the land for future financial stability.</li> <li>○ However, with this plan, the capital return is also significantly compromised and could cripple many farmers and communities. The irony is that the farmers that have respected waterways and respected the land by being responsible an proactive towards this environmental aspect of farming will be penalised by the polices need to have all farms reduce the diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens. Whilst the worse offenders only have to reduce to the 75<sup>th</sup> percentile, thus being rewarded for all their previous abuse of the land and water.</li> <li>○ If this is the first 10 years of 80 year plan, how expensive is the next 70 years going to be afterwards? Can this possibly be meet?</li> <li>● Considering the benefits to all New Zealanders and Foreign visitors, should there be a tax included to urban and travelling individual, especially those using the waterways and enjoying the benefits of the vision to help the farmers accomplish is outcome</li> </ul>	
<p>Generalised Objective of 1-3</p>	<p>I support the overall objectives behind the proposed plan</p>	<ul style="list-style-type: none"> <li>● They are very noble objectives which align with my own values and views</li> </ul>	<p>I seek to retain these objectives, whilst amending the rules to achieve them</p>

<p>Restricting land use change Page 32 (Policy 6)</p>	<p>I oppose without financial compensation</p>	<ul style="list-style-type: none"> <li>• This policy will cripple the capital value of many properties that would previously have been able to convert to dairy milking platforms due to contours and location. If this is also coupled with the N reference point then many properties will be devalued</li> <li>• Many farming enterprises, particularly marginally profitable farm businesses relied on this for financial security later in life – now their nest egg has crashed.</li> </ul>	<p>I seek that this provision be investigated further to truly uncover each farm's financial implications before the policy is enforced and consider compensation for financial losses</p>
<p>Stock exclusion Page 50 (Schedule C)</p>	<p>I support in current wording as long as this applies only to the stock listed the exclusion (domestic cattle, horses, deer and pigs).</p> <p>I oppose any alteration to the waterway definition or animals listed in stock exclusion within and beyond the 10 year timeframe</p>	<ul style="list-style-type: none"> <li>• Due to the massive costs and geographical challenge involved in fencing to provide stock exclusion and the difference in fencing requirements to exclude certain animals and not others, this rule must be viable for a prolonged period i.e. over 30 years</li> </ul>	<p>I seek that the provision be amended as set out below:</p> <p>Have a time frame for which this requirement will not alter i.e 30 years, to provide certainty of financial outlays</p> <p>External financial support be available on properties with greater than 1km of fencing required</p>