

**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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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.

If others make similar submissions, I would consider presenting a joint case with them at the hearing.

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Jo Alcock **08/03/2017**

Signature **date**

John Easton **08/03/2017**

Signature **date**

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Introduction

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

This property has been owned by my parents for 42 years. Over this time it has been developed. It has run beef breeding cows, fattening bulls and dairy grazers as they got older and health allowed.

Four years ago we converted part of the farm into a Dairy Goat operation milking 640 goats for supply to the Dairy Goat Co-op in Hamilton. With the end product being made into infant formula as goats milk is very low in lactose.

The farm size is 242ha. 108ha of this is hill country where 800 ewes are run. The balance of 134ha is flat to rolling with 220 2year old heifers, 170 heifer calves and 40 rising 3 year old steers. This is also the land used to support the dairy goats by doing cut and carry.

Cut and carry is by were the goats are housed inside and the grass is cut and brought to them daily, they do not graze the paddock.

The farm consists of 1 main river that runs through the middle of the farm, this river was fenced off from cattle 15 years ago and has a large bridge across it. This main river did use to have a lot of willow and poplar trees planted along it banks but along with the Waikato Valley Authority these trees were removed approximately 30-40 years ago as they were causing flooding and a lot of erosion of the river banks and sediment containment.

All paddocks have at least 1 water trough if not more in and all waterways have a crossing of some sort over it so that stock is not required to enter the waterway to cross it.

The goats are housed in a large shed (105m x 40m). The shed is cleaned out twice yearly and the barn cleanings are put onto crop paddocks, maize and turnips so that fertiliser is not needed.

All supplementary feed is made on farm also and this is made into large round silage bales individually wrapped to minimise wastage and leaching.

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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:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
<p><i>Objective 1 & Table 3.11-1</i></p> <p><i>And any consequential amendments arising from this submission point.</i></p>	<p>Support with amendments</p>	<p>We support the long-term restoration and protection of our waters. However, we are concerned that Table 3.11-1 80 year numerical water quality targets may not be achievable, and possibly not even achievable under pristine conditions.</p>	<p>Retain Objective 1, but amend Table 3.11-1 so that the water quality targets are achievable.</p> <p>We have hydro-electric dams on the river.</p> <p>We have deforested and introduced new plant species (pine trees in particular)</p> <p>Pest animals and plants are here. Carp in particular in lower Waikato.</p> <p>Cities and towns with roads and runoff and people are here.</p> <p>If we put too much into full restoration of the river, than objectives 2 and 4 in relation to protecting and providing for social and economic values which significantly contribute to the health and well-being of people and communities, then sustainable management will not be achieved. Full</p>

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			achievement of Objective 1 and table 3.11-1 80 year targets means that objectives relating to social, cultural, and economic wellbeing, will be massively under achieved.
<p><i>Policy 4 & Rules 3.11.5.1 & 3.11.5.2</i></p> <p><i>And any consequential amendments arising from this submission point.</i></p>	Oppose	The rules as proposed are not consistent with policy 4 and fail to provide for small and low risk farming activities to continue and to be flexible.	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.
<p><i>Restricting Land use Change</i></p> <p><i>Policy 6</i></p> <p><i>Rule 3.11.5.7 and any relevant points within the plan</i></p>	Oppose	<p>It affects the value of our land and impedes any future ability to develop and grow our businesses.</p> <p>The ability of farmers to innovate in small and big ways has ways is removed with this rule. Farmers are not able to take advantage of new technology or innovation.</p>	Council must allow for flexibility with this policy and rules, by establishing policies and rules which relate to managing effects, and which are based on recognition of underlying soil properties (natural capital of soils) and their productive potential, rather than blanket rules based on existing land uses.

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<i>And any consequential amendments arising from this submission point.</i>		We are only in our 4 th season dairy goat farming and as new technology and innovations happen we are not able to take advantage of these to either make our operation more efficient or grow it in size. E.g. buy out the neighbour.	<p>Exceptions to Land Use change restrictions should be provided, including for smaller land areas (below 40 hectares) and where environmental effects are minimal or advantageous, such as improvements in biodiversity, sediment retention, phosphorus retention, economic efficiency and optimization of natural resources.</p> <p>Restrictions and an assessment of the effects should not be limited to consideration of the nitrogen discharges as modelled by OVERSEER.</p>
<p><i>Nitrogen management application of the Nitrogen Reference Point (NRP) & use of OVERSEER</i></p> <p><i>Policy 2 and 7 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>	oppose	<p>We oppose this grand parenting 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 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.</p> <p>We 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</p>	<p>We seek that the Nitrogen Reference Point and use of OVERSEER are removed from the plan in their entirety.</p> <p>Adopt a sub-catchment approach to addressing contaminants that are relevant to each sub-catchment.</p> <p>Not a blanket restriction of one nutrient that may not even be relevant for that sub-catchment.</p>

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<p><i>And any consequential amendments arising from this submission point.</i></p>		<p>information that is entered into it. It was never designed to be used for this purpose.</p> <p>It has a 30% - 40% error rate for sheep and beef farms.</p> <p>OVERSEER does not recognise a cut and carry system for goats and therefore is not able to even give us a starting NRP.</p>	<p>For example the Wapia river doesn't have a nitrogen problem but E.coli.</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><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>And any consequential amendments arising from this submission point.</i></p>	<p>Support with amendments</p>	<p>This requirement to exclude cattle through permanent fencing is very broad and will create perverse environmental and financial outcomes for hill country which by its nature is not intensively farmed.</p> <p>Fencing on hill country is expensive and often limited to ridges – natural fence lines.</p> <p>Improvements in water quality from excluding cattle, through permanent fencing from permanently flowing waterbodies, on non-intensive hill country are not proven. More sub-catchment information is required.</p>	<p>The national waterway accord recommends that slope up to 15 deg be fenced, this also should be applied to healthy rivers.</p> <p>For cattle, horses, deer and pigs less than 15 deg slope change the exclusion requirements so that they only apply to all permanently flowing waterbodies 1m or greater.</p> <p>Give certainty that this fencing is going to be enough and the council is not going to tell farmers in 10-20 years to retire that land from all stock after making a large financial input into it.</p>

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		<p>Definition of 25 degree slope threshold/standards in Rule 3.11.5.4 which are required to be fenced up to, is not clear with no implementation plan available.</p> <p>Definition of waterbodies under Schedule C in relation to clauses i, ii, iii, and iv are still unclear and require further elaboration in order for farmers to be able to determine, what waterbodies on their properties the rules relate to.</p> <p>The timing required along with the financial input are not realistic in our situation, as we already have a large mortgage and would be unable to afford to do this.</p>	
<i>Withdrawal of the lower part of the Waikato Catchment from PC1 (Hauraki Iwi)</i>	Oppose	The Waikato Regional Council needs to treat all its constituents affected by Plan Change 1 as one entity. Withdrawal of part creates more uncertainty for those involved.	The whole plan should be withdrawn until The Waikato Regional Council can treat the whole of its catchment as one.
<i>Policy 16</i>	Oppose	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	Remove this policy.

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		contaminant discharges and the rules should be the same regardless of ownership.	
<p><i>Farm Environment Plans</i></p> <p><i>Policy 2, Rules</i> 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.4, 3.11.5.6, 3.11.5.7</p> <p><i>Schedule 6</i></p> <p><i>And any consequential amendments arising from this submission point.</i></p>	Support with amendments	<p>Application of Schedule 1 Farm Environment Plans (FEP) as proposed have the potential to greatly reduce farm flexibility in times of climatic and market fluctuations on trading properties.</p> <p>This reduction of flexibility might be perceived, but would be at a time of stress (drought, flood, market crash, market boom) further impeding decision making required.</p> <p>Uncertainty in how the rules including requirements of FEP will be implemented as the implementation plan has not been released, and large areas of uncertainty exist in how the rules and schedules have been written and lack of definitions.</p> <p>Some sub-catchments have no reduction or minimal reduction of nutrients required so imposition of cost and bureaucracy of environment plants is not warranted.</p>	<p>Council should require farm environment plans only in sub-catchments where science indicates improvements are required.</p> <p>Environment plans need to be written to allow flexibility such as with Nitrogen discharges and application of management practices such as good management practices. FEPs should be tailored to the individual property and focus on critical source management rather than applying blanket regulatory standards.</p> <p>An independent panel needs to be available to allow contested points between staff and farmers. Environment plans to be settled without the expensive need to appeal to Environment Court.</p>

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		There appears to be no low cost appeal processes available. If staff interpretation of rules, and therefore acceptance of an environment plan is debate-able. This leaves open possibility of inconsistency across the region.	

Yours sincerely

Jo Alcock & John Easton

08/03/2017

Signature

Date