

Submission Form

Submission on a publically notified proposed Regional Plan prepared under the Resource Management Act 1991.

On: The Waikato Regional Council's 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.

Donna Shellock 7/3/2017
Signature date

[Signature] 7/3/2017
Signature date

Introduction

Thank you for the opportunity to submit on the Waikato Regional Council's proposed Plan Change 1.

Our names are Jon and Fiona Sherlock. Our family has been farming at Otorohaia for 3 generations and we are currently bringing up the fourth generation on the farm. The farm business is owned by ourselves and Jon's siblings and their families and we are making this submission on behalf of ourselves and the company shareholders. The goals of the farm business are to farm sustainably in all aspects and to grow the farm to help this and future "Sherlock" generations. We understand that this can only be done by looking after the environment as well as the profitability of the farm.

We farm sheep and beef on the home block which is in the Whaingaroa catchment. We have just recently purchased, in October 2016, another farm in a Waikato River Priority 1 catchment. This is at the headwaters of the Whangape catchment. The new farm compliments the home block with the aim for the farm business to remain in the family for generations to come.

The uncertainty around the proposed Waikato Regional Plan Change 1 has greatly increased the risk around the farm purchase and the risk of farming for this and future generations. We acknowledge the necessity of farming sustainably for the environment as a whole. It is our view that this Plan Change 1 is focused on the sustainability of the rivers at a significant and unproportionate cost to hill country drystock farms. This cost will have a major detrimental impact on these farm businesses and therefore the sustainability of rural communities in these areas.

We pride ourselves on sustainable farming. We farm using rotational grazing so we do not overgraze paddocks to help with soil management and erosion. Our policy is to have no older/larger cattle on the hills over winter. We have planted poplar trees in a number of unstable areas on the home farm. These areas have also been fenced off. We have fenced off a number of native bush areas on the home farm. One of these areas is greater than 40 ha. There are also 3 blocks of bush on the new property which are fenced off. The Kerr Rd block (new block) has 32ha of QEII bush. It also has 12ha of pines which once milled will be put back into trees with the plan to retire more of the steeper hill country to trees. A significant amount of riparian planting has occurred on the Kerr Rd property. There is a very attractive large pond that is fenced off and has been planted to maintain its quality.

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>Long Term Land Use</p> <p>Objectives 1, 3, 4</p> <p>Policy 5, 7</p> <p>Rules 3.11.5.3 to 3.11.5.5</p> <p>Schedule 1.</p>	<p>We oppose the fact that we are being asked to submit on these rules in Plan Change 1 without knowing the future impact or in fact what will be asked of us in the future.</p>	<p>The reasons for this are:</p> <ul style="list-style-type: none"> ● <i>This create huge uncertainty and risk. Due to the staged approach, rules in subsequent Plan Changes are likely to get changed which creates uncertainty. For example, if we spend significant capital to fence off areas and then under new rules in the future this land may need to be retired into trees again at our cost. This making the first investment of fencing a waste of capital.</i> ● <i>Potential capital devaluation</i> ● <i>There is not enough detail around future requirement/rules.</i> 	<p>I seek that the provision is: amended as set out below:</p> <p>As an alternative I propose</p> <ul style="list-style-type: none"> ● <i>This plan needs to be re-notified once there is a clear indication of future rules</i> ● <i>Make the Plan Change 1 less onerous on hill country farmers until the future requirement become clear eg only requiring stock to be excluded from land slope less than 15 as per the NPSFW standards.</i>

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
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<p>Nitrogen Reference Point</p> <p><i>Objectives 1, 4</i></p> <p><i>Policy 2, 7</i></p> <p><i>Rules 3.11.5.3 to 3.11.5.7</i></p> <p><i>Schedule 1</i></p>	<p>We oppose the "grandparenting" approach</p>	<p>The reasons for this are:</p> <ul style="list-style-type: none"> • We are low emitters already. The plan penalises low emitters as they have to stay low. But the high emitters can remain high. It is unfair to the low emitters as it uses the state of low emitters to subsidise the high emitters. This again unfairly burdens hill country dry stock farms. • We only purchased the Kerr Rd property in October 2016. The Nitrogen reference years are prior to us owning the property and before the plan was released therefore our production and our management policies will be majorly influenced by what the previous owner had done. This is unfair and will have a negative effect on the earning potential of the farm and subsequently devalues the property so soon after we have bought it. • Nitrogen is not a major issue for the Whangape catchment. There is a water quality monitoring station downstream from Lake Whangape in the Whangape Strm at Rangiriri-Glen Murray Rd which runs into the Waikato river. The Nitrogen levels at this station are already below the 80 year target required in the plan. 	<p>I seek that the provision is: amended as set out below:</p> <p>As an alternative I propose</p> <ul style="list-style-type: none"> • <i>Remove the grandparenting approach</i> • <i>Nitrogen emissions should be at a sub-catchment level eg look at the individual catchment and determine levels based on what the specific problems are. Not a blanket approach which is unfair and reduces the productive potential of land with no benefit to the water quality.</i> • <i>Set a band that all emitters have to adhere to. Which is equitable for all low and high emitters.</i>

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<p>Stock Exclusion</p> <p>Rule 3.11.5.1 to 3.11.5.4 (inclusive)</p>	<p>We support the rule but wish to amend this to align to the national standard.</p>	<p>The reasons for this are:</p> <ul style="list-style-type: none"> • That the National Policy Statement for Fresh Water (NZPSFW) only stipulates that water bodies on slopes up to 15° be fenced. It also requires that stock should only be excluded from streams over 1m wide. Given the huge cost this will impose on hill country farmers (see below) we don't believe it is warranted to require a significantly higher standard than that required by the NZPSFW. • A directive has been sent to regional councils by central government that the communities economic well being must be considered when making decisions about the pace of water quality improvements and when establishing freshwater objectives. Having a significantly higher threshold eg slope for stock exclusion will have a significantly higher economic impact and is clearly not aligned with this directive. • The cost of fencing hill country is prohibitive. See Report to Waikato Federated Farmers Farm Environment Plan Project. For example on our home block we have more than 20km of streams. A high proportion of this is greater than the 25 degree slope. At \$18/m for 3 wire electric fence this would cost us \$720,000. We would have about the same to fence on the new farm. Not to mention the maintenance cost of upkeep of this fencing • On steep hill country you need to bulldoze the fence line which is costly and it also puts sediment into the streams and rivers and could cause erosion. • Maintaining power on these fence lines on hill country is very time consuming and costly • We support the need to allow sheep to have access to the fenced areas as they are needed for weed control. If you did not allow sheep then how would you control weed such as blackberry as you can't get tractors on the steep hill country. 	<p>We seek that the provision be amended as set out below:</p> <ul style="list-style-type: none"> • Stock exclusion criteria outlined in the NPSFW should be adopted as the standard in Plan Change 1. • Support for streams up to a gradient of 15 degrees with 1m set back

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Restriction Land Use Pages 15-16 Policy 6 Rule 3.11.5.7	We oppose the rule related to restricting land use.	The reasons for this are: <ul style="list-style-type: none"> • A restriction on land use will devalue our land by capping the productivity. Our new farm is next to a dairy farm, so by limiting the land use it automatically devalues this farm as it cannot at any stage be converted to dairy without a consent. • This is another example of low N emitting drystock farmers being made to carry an unproportionally high share of the cost of improving water quality. • This provision caps the region's productivity as farms cannot be used in differing ways. • It reduces the ability for our farm business to respond to market volatility (eg planting maize vs cattle depending on prices). Flexibility is key to drystock farms remaining profitable. • This rule is not relevant as it is captured in other provisions of the proposed plan change 1. Why limit land use if farmers can remain within the other rule parameters (e.g. NRP)? 	We seek that the provision be deleted in its entirety.

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Farm Environmental Plans Pages 15 and 16 Policy 2 Rules 3.11.5.3 - 3.11.5.7 Schedule 1	We support the provision of using of FEPs but require amendments	The reasons for this are: <ul style="list-style-type: none"> • Based on the proposed rules it will be too expensive to make changes and manage FEPs. • The timeframe to have all FEPs completed is unachievable due to the number of qualified people who can do a Farm Environmental Plan. • There is not enough flexibility to make any changes. If we want to change the plan then a new plan will have to be done by a professional. 	We seek that the provision is amended as set out below: <ul style="list-style-type: none"> • As an alternative we propose that farmers should be able to manage / amend or change the environmental plan with this being audited only.

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Contaminant Loss From Farm Objective 1 and 3 Policy 1,2,4,7 Rules 3.11.5.3 - 3.11.5.7 Schedule Table 11-1	We support but require amendments.	The reasons for this are: <ul style="list-style-type: none"> • Koi carp have a major impact on water clarity. So if we undertake all the cost to reduce sediment this will be undone by the Koi Carp. • The negative impact that Koi carp has on water quality needs to be addressed in Plan Change 1 	We seek that the provision is amended as set out below As an alternative I propose: <ul style="list-style-type: none"> • Plan must contain rules that include the control of Koi Carp.
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Subcatchment Management Policy 9 3.11.4.1 and 3.11.4.5 Implementation Method	We support but require amendments	The reasons for this are: <ul style="list-style-type: none"> • Each subcatchment has their own individual issues around water quality. Therefore Plan Change 1 should focus on the real issues that will make a difference for each subcatchment. • We believe that focusing communities on identifying and solving the subcatchment specific issues will result in more community engagement and therefore get the best results. 	I seek that the provision is amended as set out below As an alternative I propose <ul style="list-style-type: none"> • An allowance for an individual subcatchment approach in the rules.

Yours sincerely

Jon & Fiona Sherlock


 Signature

7/3/2017
 Date