

**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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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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**08/03/2017**



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**Signature**

**date**

# **WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS**

## **Introduction**

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

My family has been farming in the Waikato region for approximately 60 years. We run a sheep and beef operation, with dairy grazing support. We currently run approximately 3500 stock units on 512 hectares of moderate to steep hill country.

Our stocking rate does fluctuate depending on market and environmental changes.

We are located in the priority 2 sub-catchment, split between the Waipa River freshwater catchment Unit and the Riverine Lakes freshwater management unit.

We are actively planning to fence off duck ponds and re-establish native plantings in this area. We also have areas of native bush that is already fenced, allowing continued regeneration and survival of native plant species.

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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>3.11.2 Objective 1. Long term restoration and protection of water quality for each sub-catchment, and Table 3.11-1 80 year water quality limits/targets and any consequential amendments arising from this submission point</p>	<p>I oppose</p>	<p>While I support the long term restoration and protection of our waterways, I am concerned that the table 3.11-1 80 year numerical water quality targets may not be achievable and realistically may not be achievable under pristine conditions.</p> <p>I accept that all land owners and users must accept responsibility for water quality issues, however the quality targets are unrealistic and farmers are not the only users that need to be held accountable. Increased urban populations and therefore waste water disposal is also having a significant impact on water quality.</p> <p>The plan is attempting to adapt to the higher standards of being safe to swim in and take food from over the entire length of the Waikato and Waipa Rivers and catchment. However it is not taking into account natural events such as flooding and seasonal changes, which make swimming and food gathering unsafe.</p>	<p>Withdraw the plan and replace it with objective and realistic numeric targets that we, as a community can work towards together.</p> <p>Targets need to be set which gives a numeric value of realistic and relevant goals which pertain specifically to the Waikato river catchment. These targets need to ensure the social and economic expectations of communities are not exceeded and sensible enough to ensure we can actually achieve them.</p> <p>The targets need to be flexible to account for uncontrolled environmental conditions such as flooding. We all have to work together to improve the water quality. It is not enough to attempt to make an example of farmers, many of whom are considerate of the</p>

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			implication some farming practices have on the waterways.
<p>Objective 2: Social, economic and cultural wellbeing is maintained in the long term and Objective 4: People and community resilience</p>	<p>Support with amendments</p>	<p>I believe in maintaining the social, economic and cultural wellbeing and the respective community resilience. However I do not believe the plan change 1 accounts for this.</p> <p>Objective 4 recognises that the current proposal for PC1 will not be enough to satisfy the objectives and that further plan changes will be necessary. PC1 is already suggesting that farmers will have to provide significant investment to ensure they meet the council requirements of this plan, then providing further uncertainty to the sustainability of each farm, by failing to provide information about what will be required of us in the future.</p> <p>This is all on top of potential rates increases charged by the Waikato regional council. PC1 will already result in significant changes and future uncertainty over land use changes and fails to ensure individual and community resilience.</p> <p>The New Zealand export market is in a potentially vulnerable state. Once overseas markets such as South America have broken through the trade barriers currently restricting their ability to export, the cost of compliance for New Zealand suppliers may be unrealistic and unachievable. We pride</p>	<p>Delete objective 4 clause b. Farmers appear to be the first to be held accountable for water quality impacts. PC1 already asks for a significant investment from farmers and further uncertainty regarding additional plan changes are not beneficial to encourage resilience.</p> <p>Realistic goals need to be set which encourages community groups to work together to improve water quality.</p> <p>The plan needs to clearly outline how it plans to achieve the 80 year outcomes now, to provide some certainty for what is expected of farmers in the future. Particular care needs to be taken to ensure our export market is not compromised, realistic and objective goals need to be established which have an achievable outcome, without compromising farmer's businesses and livelihoods.</p>

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		<p>ourselves on New Zealand grown lamb and beef, however if overseas markets are able to find another supplier who is not subject to the compliance costs that we may face in the future, the returns we currently achieve on our exports will decline, potentially forcing farmers to sell their farms.</p> <p>If people are at risk of losing everything they have worked most of lives for, you will not be encouraging individuals and community resilience, you will crush it entirely. The flow on effects of this is monumental and is difficult to measure accurately. If PC1 continues at the current proposal, farmers may be forced to sell land that has been significantly devalued, is unable to change farming type or stocking rates and is restricted to unrealistic and unfair nitrogen referencing.</p> <p>Small rural communities work together to achieve a successful dynamic, which may include schooling, shops, café's etc. This dynamic relies on participation from both farmers and the community. If you compromise a farmer's ability to participate, the community and its ventures may fail. The social and economic wellbeing of a community relies on these factors, which is essential to community and individual morale.</p>	

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<p>Permitted Activity Rules Rules 3.11.5.1 and 3.11.5.2</p>	<p>Oppose</p>	<p>The proposed rules 3.11.5.1 and 3.11.5.2 fail to provide for low risk land users and fails to provide flexibility for these land users.</p> <p>This leads to a plan which is inefficient, where the costs of implementation and compliance outweigh the environmental benefits.</p>	<p>Amend rules 3.11.5.1, and 3.11.5.2:</p> <ol style="list-style-type: none"> <li>1. Incorporate into one rule</li> <li>2. Amend to include as Permitted Activity land uses with stocking rates at or below 18 stock units and enable stocking rate to increase from current up to this standard, or and</li> <li>3. Relate stocking rate or/and nitrogen discharge to the natural capital of soils for sustainable production/ farming;</li> <li>4. Delete 6 stock unit standard</li> <li>5. Delete 4.1 hectares and provide for up to 20 hectares</li> <li>6. Apply national stock exclusion requirements which relate to exclusion of cattle, deer, and pigs, from permanently flowing waterbodies, through fencing (temporary and permanent or natural barrier, or other technologies) on flat land and rolling land, but not hill country</li> <li>7. Enable flexibility in land use, discharges, and stocking rates up to these standards</li> </ol>

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			<p>8. Delete any standards or clauses which hold land uses to historic discharge levels or stocking rates</p> <p>9. Delete standard 4c Rule 3.11.5.2 10. Amend riparian setback distances so they only apply to flat and rolling land and not hill country (ie slope <math>\geq 15</math> degrees).</p>
<p>Nitrogen Management Adopts a Nitrogen Reference Point (NRP) approach and holds existing land users to this number (Grandparenting of Nitrogen leaching) Rule 3.11.5.3, 3.11.5.4, - 3.11.5.7, Schedule B, and definition of a stock unit, and any consequential amendments arising from this submission point.</p>	<p>I oppose</p>	<p>I oppose the method of grandparenting to reduce nitrogen leaching. It is not fair to put all users into the same group as the low users will be penalized for adopting responsible farming practices and the high users can continue to pollute waterways at the same rate.</p> <p>For the past 5 years we have been using Agrisea liquid fertiliser which is naturally low in nitrogen, compared to traditional fertilizers. While it is an excellent product, it is expensive and with the added financial demands which would be required by PC1, it may be unsustainable for us to continue using this product. Therefore we may be unable to continue develop our farm based on these demands. The same is true for farms who have adapted a conservative management approach in the past or looking forward to the future.</p> <p>The nitrogen reference point is to be established</p>	<p>I seek that the provision relating to the adaption of the nitrogen reference point is deleted in its entirety.</p> <p>Nitrogen leaching can be monitored through stock units which will be outlined in the farm environment plans. This will prevent the conservative users from being targeted and penalised for having sustainable and sensible farming practices.</p> <p>Remove the use of default values and incorporate actual weights and values which are specific to each farm. It is not possible to standardise values to accurately apply to all farms without bias and misrepresentation.</p>

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		<p>from the past three years, some of which were drought years. In an attempt to maintain appropriate animal welfare standards, many farmers will have de-stocked in response to this. To use this method now will restrict changes to stocking numbers and penalise farmers for responsible management decisions that had to be made in response to environmental challenges.</p> <p>I oppose the use of OVERSEER as a tool to determine the nitrogen reference point. It is based on assumptions that may vary depending on the information that is entered. The use of 'default' values as opposed to actual weights skews the data and provides a misleading and misrepresented data model.</p>	
<p>Stock Exclusion. Schedule C Rule 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.4, 3.11.5.6, definitions, and any consequential amendments arising from these submission points.</p>	<p>I oppose</p>	<p>The requirement to exclude cattle from waterways by means of permanent fencing is very broad and will create significant environmental and financial implications on hill country, which by the nature of the land is not intensively farmed.</p> <p>Fencing on hill country is challenging and is often limited to ridgelines, which do not necessarily fit where the waterways are present.</p> <p>A 3m boundary will result in additional maintenance and weed control on land that is earning less per hectare and the definition of the 25 degree slope is not well defined and there is no</p>	<p>A suitable alternative would be to amend the rules requiring cattle to be excluded from waterways, and apply them on a farm by farm basis based on the scientific information generated by each subcatchment. This can then specifically be tailored to subcatchments that have been scientifically identified as having a water quality issue.</p> <p>The 25 degree slope provision should be removed and replaced with farming operations having over 18 stock units</p>

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		<p>clear implementation plan.</p> <p>Exclusion from waterways requires additional water reticulation, which is both challenging and expensive on hill country due to pumping and structural demands.</p> <p>There is limited scientific information which supports the idea that water quality on hill country is improved by excluding cattle from waterways. Therefore more factual information is required on a sub catchment by sub catchment basis.</p>	<p>per hectare.</p> <p>Farm environment plans can be utilised to focus on areas which have scientific proof of water quality deterioration, rather than have a system wide ban of cattle from waterways.</p> <p>Flexibility needs to be an option to allow cattle to be mustered through waterways without an approved stock crossing, when crossing less than three times per week.</p>
<p>Farm Environment plans Policy2, Rules 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.4, 3.11.5.5, 3.11.5.6, 3.11.5.7 Schedule 1</p>	<p>Support with amendments</p>	<p>The application of the farm environment plan proposed by the Waikato regional council has the potential to reduce flexibility in times of market, environment or financial fluctuations. It is not possible to control rainfall or market prices, factors which govern decisions regarding responsible farm management. The rigidity of the plan reduces the ability of farmers to control the management of their farm, reducing the potential sustainability of the farm and the time constraints applied to the plan make it potentially unfeasible.</p>	<p>The use of the farm environment plan should be implemented in sub-catchments that have scientific evidence of the need for improvement.</p> <p>Plans must be flexible to accommodate market and environmental changes which may have a significant impact on farmers.</p> <p>Remove the time constraints and allow farmers to set a plan based on their financial restrictions and apply it to the scientific, subcatchment specific data which will provide the most significant waterbody improvement.</p>

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Yours sincerely

Kate McLaughlin



8/3/2017

Signature

Date