

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

Submission Form

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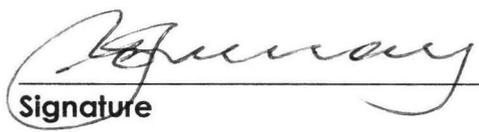
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We are not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

I wish to be heard in support of this submission.

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

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

 7/3/17
Signature date Chairman

 7.3.17
Signature date General Manager

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.

I am writing to you as the Chairman of Maraekowhai Ltd. Which is a pastoral sheep and beef-cattle farming business.

Our farm property that is subject to Plan Change 1 is in the Priority One, Mangaokewa subcatchment, Waipa FMU

Property registration and a

Nitrogen Reference Point by 31st March 2019

A Farm Environment Plan by 1st July 2020

Stock Exclusion by 1st July 2023

The farm estate is made up of 3 stations and a finishing farm totalling 8250 ha. Most of this land is within the Ruapehu District, Horizon Regional Council catchment however part of the finishing farm comprising 972 ha is within the Mangaokewa subcatchment (Priority One) of the Waipa Freshwater Management Unit.

Our core business is sheep and beef-cattle farming and the finishing farm is used primarily for finishing prime lambs and beef cattle.

The finishing farm has been in the company's ownership for the last 4 years.

All properties have an operable farm environment plan in compliance with the Horizons One Plan developed in 2010. We have always been mindful of our responsibility as land custodians and exercise what we believe is good stewardship.

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

Using the farm environment plan we have since undertaken a lot of stream side riparian planting and this has extended into gullies and hillsides as appropriate including track cuttings. We have also deliberately allowed scrub to regenerate where it made sense to do so. Space planting of poles is a regular activity having now planted 19,000 poles to date across all farms. Our farm management modus operandi is keep it simple, practical common sense ensuring we operate in a sustainable and efficient manner and this has allowed good productivity to be achieved. Our stocking rate matches the capability of the land at about 10 stock units per ha with a ratio of 60% sheep, 40% cattle which we find is a good complimentary mix. The grazing management varies as needed throughout the year in tune with the seasonal pasture growth curve and we are particularly conscious not to overgraze. Pasture production is supported by regular use of fertiliser as recommended by the Ravensdown field representative maintaining nutrient levels in the optimal range. In summary, we believe the farms are managed sustainably applying good pragmatic stewardship matching land use with its natural capability. It is our intent that we will continue with this approach because it has rewarded us well and maintains the countryside in good stead.

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.

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

The specific provisions my submission relates to are:	Our submission is that:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
Objective 1 & Table 3.11-1	Support with amendments	We support the long-term restoration and protection of our waters giving effect to the Vision and Strategy. However, we are concerned that the table 3.11-1 80-year numerical water quality targets are probably not achievable, and possibly never were in such a state even under pristine conditions	<p>Retain the intent of Objective 1, however amend Table 3.11-1 so that the water quality targets are achievable.</p> <p>Water quality targets, should provide for the values of waterways such as ecological health, and cultural values. However, they should also be set at numerical states which foster the social and economic wellbeing of people and communities, and consider any implications for resource users, including implications for actions, investments, and ongoing management changes.</p> <p>Amend Table 3.11-1 so that the numerical targets do not apply during or soon after flood events or other inhospitable times when it is not normal for people to swim or have primary contact with water typically undertaken for cultural reasons.</p>
Objective 2	Support this objective with amendments	We believe maintaining the long-term social, economic, and cultural wellbeing of the Waikato-Waipā communities is essential to the on-going future of our rural and urban communities.	Retain and strengthen the objective in relation to providing for the long-term social, economic, and cultural wellbeing of the Waikato-Waipā communities. Including ensuring the

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

	Our submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>We are concerned that the plan does not achieve this, as set out below.</p>	<p>economic resilience, sustainability, and vibrancy, of people and communities.</p>
<p><i>Objective 4</i></p> <p><i>People and community Resilience</i></p>	<p>Support with amendments</p>	<p>We support objective 4 in relation to providing for People and community resilience. However as currently proposed the objective fails to provide for this outcome. As currently proposed it is recognised that PC1 will not achieve its objectives. Future changes will need to include increasingly tougher restrictions of land use controls will be required (Objective 4b). The result of this is that PC1 fails to provide communities and individual's any certainty about their futures and what will be required of them, and it therefor fails to ensure people and community resilience.</p> <p>The plan fails to provide a pathway for individual and communities to work together to achieve the vision and strategy.</p>	<p>Amend the objective so that it provides for People and Community resilience over the life of the plan.</p> <p>Numerical Freshwater objectives should not be set if they are not achievable. The plan should clearly set out how it intends to achieve the 80-year outcomes now to provide certainty for people and communities.</p> <p>Delete clause b. Include a new objective which will provide for community and individual resilience, management processes which allow for adaption, and community lead sub-catchment approaches.</p> <p>Delete any reference to the staged approach and future plan changes including increasing stringency in land use control and requirements.</p>

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

	Our submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>Enforcement of 3.11.5.4 and 3.11.5.2 will heavily reduce farm profits, land values and community viability; making objective 4 People and community resilience unattainable.</p> <ul style="list-style-type: none"> • Our farm production output will be capped, but farm costs will increase substantially with the need for stock exclusion fencing, culvert installation and water reticulation etcetera which will impact on our financial security considering but not limited to equity, availability of working capital, interest and depreciation etcetera. • Land values will decrease as farmers are unable to develop and improve their land in a financially rewarding manner, which means their ability to borrow will reduce <p>Our community will suffer through depopulation, infrastructure decay and reduced services.</p>	
<p><i>Nitrogen Reference Point (NRP)</i></p>	<p>Support in part and Amend in other parts</p>	<p>We understand the need to know what the contaminant loss rate arises from every farm to understand the load to water. We therefore support the NRP being used for this purpose.</p>	<p>The relief we seek is that i) land users who have low N loss rates i.e. ≤ 20 kgN/ha should not be grandparented; and ii) all pastoral land users with low N</p>

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

	Our submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>We do not support the NRP used in a manner to cap (Grandparent) land use where nitrogen loss rates are low. This penalises those with low loss rates where the impact upon water quality is negligible. Our farm system relies upon flexibility to change livestock policies reflecting climate and market change. This change will incur an adjustment in nitrogen loss but by and large it is not significant in comparison to other land use where N loss rates are significantly higher.</p> <p>We do not believe a rolling N loss average will provide the flexibility we demand. The flexibility we seek is not land use change as such but simply adjustments of our normal livestock policies typical of sheep and beef-cattle farm systems</p> <p>We support where land use incurs very high N loss that this loss be reduced to the dairy 75th N loss percentile per FMU</p>	<p>loss farm systems should have an equal allocation of 20 kgN/ha to provide them the needed flexibility to operate a viable and sustainable farm business</p>
<i>No Land Use Change</i>	Oppose in part with amendments	<p>The No Land Use Change rule is a blanket catchment wide approach that effectively limits change in those sub catchments when change and associated contaminant loss will not lead to waterway degradation. This limits opportunity and innovation for no good pragmatic reason. Where there is scope for land use change but is restricted there is possibility affected properties could be</p>	<p>Relief sought</p> <p>The No Land Use Change rule should only apply in those sub catchments where contaminant loss is over allocated. These sub catchments need to be identified and this rule applied only to these.</p>

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

	Our submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>rendered uneconomic. There should be opportunity to seek compensation in part or in full based on current market values.</p> <p>This rule would affect our ability to increase production and improve a ROI performance</p> <p>We live in a functioning democracy, not a soviet collective of yesteryear</p>	<p>All other subcatchments should have freedom to change land use. If not, then compensation should be forthcoming an amount determined by a board with farmer representation as part of. Marginal Lands Board type approach</p>
<i>Farm Environmental Plans (FEP)</i>	Support in part	<p>We believe well prepared Farm Environment Plans that are tailored for the individual needs of each property and land use are a valued tool deserving of our support.</p> <p>We question whether there will be enough well qualified people with adequate experience to become Certified Farm Environment Planners particularly those who will engage with the sheep, beef-cattle and deer sector and where soil conservation will be a big component of an FEP</p>	<p>Relief sought</p> <p>Farmers cannot be penalised if there is not enough capability and competency to provide the required expertise preparing FEPs</p> <p>Time extensions need to be granted in advance when it becomes known that it will be impossible to meet specified FEP submission deadlines</p>
<i>Hauraki Exclusion</i>	We Oppose	All land users in the PC1 region be treated equally.	<p>Relief sought</p> <p>Place the plans process on hold until the catchment is reinstated as was originally.</p>

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

	Our submission is that:		The decision I would like the Waikato Regional Council to make is:
<p><i>Sub Catchment scale planning.</i></p>	<p>We support this approach</p>	<p>Every farmer will know what must be done to control / mitigate their own contaminate loss, take ownership and be responsible for. We believe that land use must be sustainably managed adopting good stewardship.</p> <p>Before pointing the finger, WRC must have good evidential science with peer reviewed findings. The Overseer tool must be developed further to withstand scrutiny and question.</p>	<p>The WRC's ability to accurately measure contaminate loss and ascertain source needs to be beyond reproach, must be science based.</p>
<p><i>Stock Exclusion</i></p>	<p>Support with modifications</p>	<p>A blanket approach is like a doctor talking to a patient with a sledge hammer not a scalpel. One size fits all does not make sense.</p> <p>Every farm is unique, this is a very serious issue, and if not managed correctly the cost will cripple farm businesses, the negative impact will ripple through rural towns, school roles, rural service industries, council viability, etc.</p> <p>We believe that stock exclusion on flat land ≤ 15-degrees is doable and cost effective for purpose. However, in hill country where contaminant loss risk is low the cost benefit is dubious and more so if reticulated water systems must be installed in lieu</p>	<p>Relief sought</p> <p>In hill country stock exclusion, should only apply following an assessment using the Farm Environment Plan identifying critical source areas and high management risk. This will equate where the stocking rate of cattle and / or deer is high ≥ 1000 kgLW/ha</p> <p>It is probable that some farms will have to revert to forestry. Should that happen the farmers should be compensated in full should that be the outcome. A statutory board with powers to decide with farmers of repute as part of the board make up.</p>

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

	Our submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>of natural water.</p> <p>What is intolerable is that in some sub catchments the application of stock exclusion as a mitigation may not be enough to limit contaminant loss and that afforestation may be the only effective mitigation to apply. This has not been communicated to farmers which is irresponsible. Farmers will spend good money putting up fences, installing water reticulation to no avail. It may cause farmers financial ruin. This lack of certainty is cruel, creating distrust and anxiety.</p>	
<p><i>Plan Change 2- 2026 and beyond</i></p>	<p>Where to from here</p>	<p>Farmers who make every effort at significant cost to comply, have no guarantee that future rules integrated within Plan Change 2, 3, and others could then force them to retire all their holdings to forestry. This lack of certainty is irresponsible</p>	<p>Land owners should have those concerns enshrined in statute that provide comfort that Plan Change 2 or 3 etc. will not require them to convert to forestry. If that undertaking cannot be given compensation in full will be afforded them.</p>

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

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

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

Yours sincerely

 7/3/17
Signature Date