

**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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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**

M.T. Mylly                      28 Feb 2017  
**Signature**                                      **date**

C.E. Ravenscroft                      28/02/2017.  
**Signature**                                      **date**

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**Introduction**

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

Our names are Mike and Clare Ravenscroft and we own and farm 140 acres in the Mangaohoi catchment in the district of Paepaerahi. The property was formerly a run-off for our dairy operation two kilometres away on Monckton Road and was purchased by us in 1994 when we came under pressure to increase production on the dairy farm. Unhappy with the factory farming approach to dairying that was emerging, we sold the dairy farm and decided to do our dream of being dry stock farmers on the run-off. These 140 acres were originally cleared of scrub by a Government Works scheme for unemployed men in the Depression of the 1930's and following WW2 were one of three dairy farms created up our road for returning soldiers.

The farm comprises approximately 50% moderate to steep hill and 50% rolling land. Approximately 10% of the farm is used for sheep and 90% for dairy beef rearing and fattening. In the time that we have been on the farm we have managed, as cash flow permitted and with input from off farm income, to fence off some wetlands, and plant both natives and exotic woodlots. We have also constructed a deep litter shed for fattening heifers during the winter. Variable returns for both wool and lamb have resulted in us needing to have a greater focus on beef fattening and reduce sheep numbers. We need to have flexibility in both stocking numbers and types in order to maintain a viable business and we need to be able to use all of the land currently in pasture to be able to do that.

We support the long term vision for healthy water but feel that aspects of the proposed plan are punitive and impractical for dry stock farmers who are mostly at the lowest level in terms of contributing sediment, nutrient and microbial pathogen discharges. We would like to see consideration given to small catchment schemes being developed. We have just one main stream in our valley, the Korokanui Stream. With just two dairy farms in the valley and eleven dry stock and grazing farms, it would be an excellent case study where accurate individual farm data could be gathered and a plan developed for the future. It would be a plan that we all had a chance to contribute to and learn from.

M.T.H  
C.E.R.

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**The specific provisions of proposed Plan Change 1 that my submission relates to:**

**Long term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit Objective 1, and Table 3.11-1**

3.11.2 Objective 1 Long term restoration and protection of water quality for each sub-catchment

Table 3.11-1 80 year water quality limits/targets and any consequential amendments arising from this submission point.

**We support or oppose the above provision/s**

Support but request amendments to Table 3.11-1

**Our submission is that :**

1. Urban contaminants are not reflected in the table.
2. This table under represents the range of impacts on the water quality and does not indicate Phosphorous levels which are discharged into the catchment. Published science reports reveal that it is a combination of nitrogen and phosphorous that is one contributing factor to damage of water quality of the rivers.
3. Objectives 2 and 4 relating to social, cultural and economic well-being have no such measurable targets and as a result are at risk of not being given the same attention as the defined water quality targets.

**The decisions we would like the Waikato Regional Council to make are:**

1. Amend Table 3.11-1 to include data from testing sites close to all settlements in the catchment of 200 or more people where the settlement has buildings less than 1 kilometre from a catchment waterway.
2. Add Phosphorous levels/targets to the table and data gathering.
3. Develop a table that indicates measures of social, cultural and economic well being.

**The specific provisions of proposed Plan Change 1 that my submission relates to:**

**Withdrawal of the lower part of the Waikato Catchment (Hauraki Iwi) from PC1**

Partial withdrawal of proposed Waikato regional Plan Change 1

**We support or oppose the above provision**

Oppose

**Our submission is that :**

Withdrawal of one part of the catchment removes the plan's intention to maintain a "consistent approach across the catchment".

**The decisions we would like the Waikato Regional Council to make are:**

1. Postpone implementation of the Plan until issues with Hauraki Iwi are resolved and the consistent approach across the catchment is possible.
2. Publish a negotiated time frame for the above resolution process to take place.

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**The specific provisions of proposed Plan Change 1 that my submission relates to:**

**Land Use Change Provisions and Restrictions**

Restricting Land Use Change Rules 3.11.5.6 and 3.11.5.7 and any consequential amendments arising from this submission.

**We support or oppose the above provision**

Oppose

**Our submission is that:**

1. Change in land use on our farm has been a balancing act between response to market forces and environmental impact.
2. Restrictions such as this will limit business opportunities in the future and could negatively affect the value of our land.
3. No business can live with restrictions like this and face a future of increasing uncertainty and possible regression. A business either grows or goes backwards. It does not stand still.
4. There is insufficient information around the timeframe that resource consent applications may take to be processed; nor is there a clear indication of the cost involved and the "possible future restrictions".
5. We do not set the prices for the products we produce. We need to change both stock types and numbers as prices dictate in order to remain a viable business.
6. There is insufficient information around the size of land that these provisions relate to.

**The decisions we would like the Waikato Regional Council to make are:**

1. Delete Rules 3.11.5.6 and 3.11.5.7
2. Replace with policies and rules that allow for land use that is both economically and environmentally sound.
3. Provide clearer information about the size of land that these provisions relate to.
4. Delete the nitrogen reference point (grandparenting ) clauses and standards.
5. Ensure that the costs of implementing these rules are socially and economically acceptable.
6. Before replacing these rules, engage in a wider consultation so that stakeholders most affected by the rules are more able to have input into creating workable solutions.

**The specific provisions of proposed Plan Change 1 that my submission relates to:**

**Farm Environment Plans**

Schedule 1 Rule 3.11.5.3, 3.11.5.4, 3.11.5 and any consequential amendments arising from the submission point.

**We support or oppose the above provision:**

Oppose

**Our submission is that:**

1. Schedule 1 Farm Environment Plans, while intended to protect the environment , does not reflect the element of Objective 2 relating to economic well being as it is likely to greatly reduce our ability to respond to market, climate and social changes.

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- 2. Schedule 1 Farm Environment Plans is a low trust model that imposes regulation across the catchment despite the fact that not all sub-catchments require a reduction of nutrient discharge.
- 3. The requirement that the FEP must be approved by a Certified Farm Environment Planner disempowers the land user who wants to learn how to complete this task and should be able to do so. Being required to use an external approver adds yet another layer of costs and creates a relationship of dependency.

**The decisions we would like the Waikato Regional Council to make are:**

- 1. Farm Environment Plans should only require minimal data for sub-catchments where data indicates that there are no improvements needed.
- 2. Land users have an opportunity to learn how to prepare their own Farm Environment Plans and the right to prepare their own if they so choose.
- 3. A low cost appeal process is available to avoid varying Staff interpretation of rules.

**The specific provisions of proposed Plan Change 1 that my submission relates to:**

**Stock Exclusion**

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.

**We support or oppose the above provision:**

Oppose

**Our submission is that:**

- 1. We already have fences where it has been practical, cost effective and where they do not create further erosion.
- 2. We are a relatively small farm and these rules will create unreasonable economic and environmental outcomes.
- 3. Our hill country is not intensively farmed and consideration is already given to both seasonal and weather changes when deciding what stock to graze there.
- 4. The descriptions around degree of slope where fencing is required are unclear.

**The decisions we would like the Waikato Regional Council to make are:**

- 1. Farm Environment Plans are used to target actual risks and focus on managing these risks rather than having a one size fits all blanket approach using permanent fencing.
- 2. The 25 degree slope provision in rule 3.11.5.4 be removed and replaced with a stock unit farming intensity that considers stock management practices and environmental impact on a farm by farm basis.

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**The specific provisions of proposed Plan Change 1 that my submission relates to:  
Nitrogen Reference Point (grandparenting existing users to an historic nitrogen leaching number)**

Nitrogen Management Adopts a Nitrogen Reference Point (NRP) approach and holds existing 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 from this submission point.

**We support or oppose the above provision:**

Oppose

NRP reduction to 75% percentile is supported and we would like it retained.

**Our submission is that:**

1. NRP reduction to 75% percentile is supported.
2. The use of historic benchmark dates creates winners and losers in the system with higher dischargers ironically being the winners. This system produces inequalities and reduces the opportunity for a collective community approach to environmental planning.
3. We have not had experience with OVERSEER before and are being forced to use a questionable computer model to produce a NRP that will determine the outcome of our business. A tool has been turned into a rule.
4. The requirement to use OVERSEER or another Waikato Regional Council approved programme brings with it yet another compliance cost. Current figures from a Farm Consultant using the programme are \$3,000.00 for the initial data set up and approximately \$500 per annum to get annual reference data.
5. The stock unit table provided by Waikato Regional Council is an unacceptable tool as it produces inaccurate data in OVERSEER by using a date for animal class rating rather than an animal's weight.

**The decisions we would like the Waikato Regional Council to make are:**

1. Remove the requirement for extensive operations and sheep and beef farmers to have to manage to a NRP through these provisions as there is too much emphasis on theoretical modelling and insufficient evidence of cost benefit data.
2. Where OVERSEER is used, apply actual stock weights to create a more accurate stock unit measurement.
3. In order for there to be equality across the catchment, determine an upper NRP limit per hectare that applies to all farms and require a resource consent to go above that limit.

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