

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.

We are a father and son partnership, farming sheep and beef in Oparau. We own 4500 acres at the base of the Pirongia Mountain on the western side. We run breeding cattle, breeding ewes and fatten most of their offspring. We are fourth generation farmers of this land. The tributary rivers run into the Oparau River through our farm and is approximately 10kms

We currently hold the lease on 100 acres of land at Hauturu, on Hauturu Road. We also have grazing on 700 acres on a neighbouring property on Pirongia West Road, and 2200 acres in the Kawhia Pines for our breeding cows over the winter.

We have a low stocking rate and our farm is run extensively, with no water reticulation other than that around the 5 homesteads and woolshed. Due to the size and topography parts of our land is still in the developmental stage. Gorse is a huge problem in our valley and is prevalent in ours and the surrounding farms, and in the past has added financial constraints to further development.

We have environmentally focused policies in place to ensure that our soils and waterways are protected during the at-risk periods of the year (e.g. during winter and heavy rainfall events we only run smaller framed stock on the hills; we break-feed our crops from top to bottom to help filter run-off and to protect our soil, etc.)

Although we are not within the Waipa-Waikato catchment, there has been indication from the Waikato Regional Council that this plan will be rolled out to the rest of the region in the future. Were this to happen in the plans current state, it would have a huge effect on our livelihood, and the livelihood of our local and surrounding communities.

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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:		RELIEF SOUGHT
	SUPPORT / OPPOSE	REASON	
<i>Objective 1</i>	Support with amendments	We support the long-term restoration and protection of our waters. However Plan Change 1 (PC1) as it stands does not meet this goal.	<p>Modify the Plan to include a section whereby the economics of properties are incorporated with the environmental aspects, so that it also takes into account the economic costs versus the environmental gains.</p> <p>There is indication in the plan that it will rely on future technologies to help meet the targets as set out in PC1. What if these technologies are not found?</p> <p>Change the targets to be realistic and achievable in todays standards.</p>
<i>Nitrogen management application of the Nitrogen Reference Point</i>	Oppose	We oppose the use of the Nitrogen reference point (NRP) and the grandparenting approach (holding users to their Nitrogen Reference Point). It	We seek that the Nitrogen Reference Point and use of OVERSEER are removed from the plan in their entirety.

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<p><i>(NRP) & use of OVERSEER</i></p> <p><i>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>		<p>heavily penalises the low emitters and rewards the polluters. There is no scientific evidence that a blanket rule for nitrogen restriction will be beneficial in the short or long term.</p> <p>Low emitters should not be held to their NRP, as it removes the ability to generate more income (through development and improvements) to address the contaminants which are relevant to their farm.</p> <p>I 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 information that is entered into it. It was never designed to be used for this purpose.</p>	<p>A sub-catchment approach should be used which focuses on the contaminants of each particular sub-catchment and is based on science.</p> <p>Use the Farm Environment Plan (FEP) to determine the best scenario for each farm and allow them to address the potential or present contaminants.</p> <p>Amend the rules so that they are effects and science based, not based on holding land uses and land users to historic leaching rates, stocking rates, and land uses – grandparenting.</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 support with amendments</p>	<p>The national waterway accord <u>recommends</u> that slopes up to 15° be fenced, this should also be applied to PC1.</p> <p>The timeframes for total stock exclusion are too tight. We would have to fence well in excess of 30km of waterways. We would then require a comprehensive water reticulation system. The financial implications of this are huge, I don't believe it would be possible in the timeframes allowed in PC1.</p> <p>The geography of a large portion of our land makes the fencing off of waterways extremely difficult.</p>	<p>Change the definition of a waterway to that of the National Water Accord</p> <p>Change the slope requirements to 15° as per the National Water Accord</p> <p>Let the individual FEP present mitigations against contaminants, relevant to each farm, rather than a blanket approach.</p> <p>Any waterway fencing and contaminant mitigation should be subsidised by Waikato Regional Council</p> <p>Let science determine the necessity of fencing of waterbodies, based on their current level of contamination, stocking</p>

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			rate and the proven impact of fencing of waterbodies.
<i>Policy 16</i>	Oppose	We oppose this policy. The application of the rules should not be based on the ownership of the land. The issues addressed in this plan are contaminant discharges and the rules should be the same for all regardless of ownership.	We seek that this policy is removed

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Yours sincerely

Lyle Gilbert

RS Gilbert 6/3/17
Signature Date

Richard Gilbert

RM Gilbert 6/3/17
Signature Date