

**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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Hamilton East  
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*Complete the following*

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**Phone (cell): 0276628470**

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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.

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*P A Kidd*

*March 5<sup>th</sup> 2017*

Signature

date

*M M Kidd*  
Signature

*March 5<sup>th</sup> 2017*  
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.

We are Peter & Marilyn Kidd, farming a 391 ha Dairy & support unit at Tihoi south of Mangakino. The property encompasses 48 ha of soil conservation areas. We have farmed here for 34 years initially as Sheep & Beef and the last 21 years as Dairy farmers.

We have endeavoured to farm sustainably having being awarded the Nutrient Management and Waterways Protection Awards in 2008 Ballance Farm Environment Awards. Our DairyNZ Sustainable milk plan 2013 provides the basis for some of our comments.

I submit from a farmers perspective.

My submission relates to the the workability and equity of the proposal.

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

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><i>Policy 2</i></p> <p><i>Tailored approach to reducing diffuse discharges from farming</i></p>	<p>I support with amendments</p>	<p>The reasons for this are: I believe the approach needs to be on a property basis but this policy does not account for those properties which have much higher initial costs. E.g Require water schemes and have difficult contour. See further below under Stock Exclusion regarding land use change incentives.</p> <p style="text-align: center;">•</p>	<p>Clause (e) of policy 2 should be clear that discretion should be given to difficult properties being fenced by 2026.</p>
<p><b>The Plan as a Whole</b></p> <p>Uncertainty to farm in the future</p>	<p>Support in concept</p>	<p>I support the 80 year aspirational goal but have real reservations whether this plan will take the majority of people affected with it, rather than force change on an affected minority. There is only a stick and no carrot.</p> <p>I am proud of the productivity and sustainability I have directed our farm business to attain in a manner accepted by society as good or excellent. This plan now points toward unravelling this past work</p>	<p>That WRC must put additional resources into this project as a reality of its complexity and considerable impact on well run, legally productive businesses.</p> <p>An appeal mechanism to view business cases which believe their position will be untenable. This would be like the page 29 Objective 3 reasons: "further action required ....will occur on a case by case basis".</p>

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<p><i>3.11.5.7 Land Use Change</i></p>	<p>Support in part.</p>	<p><b>1/</b>This must be treated as a moratorium only and be further evaluated especially as it affects the flexibility of low impact land use.</p> <p><b>2/</b>Previous modelling of my Dairy business, under old Overseer versions, showed that to achieve a large reduction in N leaching required a concrete surface and infrastructure PLUS 1200 tonne of maize silage for Carbohydrate in the diet. Unfortunately this model may no longer be relevant as I am advised that recent Overseer upgrades now show Maize as leaching up to 130 kg N / ha / year. No one will be allowed to grow my maize on land currently in pastoral use.</p>	<p><b>1/</b>Engage suitably qualified persons to investigate the impact on currently low impact pastoral land users with a view to gauging individual property / business impacts and ensuring their future viability.</p> <p><b>2/</b>Allow <b>flexibility</b> between properties/business's so the overall benefit to the environment can be achieved. No farm operates in a silo.</p>
<p><b>Nitrogen Reference Point</b></p> <p><i>Objectives 1 and 4 Policies 2 and 7 Rules 3.11.5.2 to 3.11.5.7 Schedule B, and any other related provisions</i></p>	<p>Accept in part</p>	<p>I accept the overall concept of the NRP. I submit that the 15kg / ha / year in 4(ii) is too low to allow flexibility to follow economic trends in the low emitting pastoral land uses</p>	<p>Further investigate the impact on the flexibility of low impact pastoral land use of the NRP as it stands with a view to keeping businesses viable.</p>



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<p>Schedule B .f. Reference Period.</p>	<p>Oppose</p>	<p>especially when infrastructure changes are likely to be at a substantial cost. Recent upgrades of Overseer have shown winter cropping on Pumice soils increase from 120 kg N / ha / year leaching up to 340 kg/N/ha/year. While this highlights an area for attention it also shows how huge the changes of an upgrade can be. To provide certainty for environmentally positive investments I require secure data on which to base my decision. A shifting basis will see me investing as little as possible so not as to risk my investment being stranded by future negative upgrades of Overseer.</p> <p>A two year reference period is too short and can place farmers unwittingly in a poor situation due to unfortunate circumstance surrounding management during those two years. E.g. sickness or bereavement as in the Taupo Variation 5 case.</p>	<p>Maintain one (current) version of Overseer as your basis with any future changes being negotiated but not used to strand well intentioned business decisions.</p> <p>A reference period going back a further 3 years to equal 5 years. 2011 to 2016 This will remove unfortunate anomalies.</p>

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<p><i>Schedule B page 49</i></p> <p><i>Missing Data</i></p>	<p>Oppose</p>	<p>The default applied at 75 % of the average (50%) for the FMU for land owners with missing data, leaves new land owners from 2014 to 2016 very vulnerable to the other partys (vendors) lack of data or unwillingness to provide that data. I have family members in just this situation.</p> <p>The percentage applied is of the whole FMU which will have an average from all land uses. Therefore a dairy unit purchased between 2014 to 2016 may receive an unworkable NRP .</p>	<p>The average for that land use shall apply.</p> <p>These defaults must be relevant to the land use and available data from third parties e.g. Ballance or Ravensdown should be subpoenaed. No land owners business' shall be made unworkable by other parties.</p> <p>A discretionary body must handle these cases.</p>
<p><b>Stock Exclusion</b></p> <p>Policy 2 Rules 3.11.5.2 to 3.11.5.7 and Schedule C, and any other related provisions</p>	<p>Support with amendments</p>	<p>The Council needs to incentivise land change on marginal land areas which are hard to fence or provide stock exclusion. Variation 5 in Lake Taupo catchment showed what can be achieved when incentives combined with the Carbon market make a 25 year investment in trees a viable proposition for family businesses. These businesses cannot afford to independently invest in any significant area, on a 25 year return horizon, but with help this was achieved in Taupo. Why not</p>	<p>Incentivise land use change to low environmental footprint non- pastoral uses.</p>

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<p>Policy 13.a,b,c. Point Source consent duration.</p>	<p>Support</p>	<p>start now?</p> <p>I submit that any enterprise expending substantial funds on infrastructure for environmental protection should have the same consideration as point source consents.</p> <p>If a dairy farmer invests \$2000 per cow on hard infrastructure to contain and reduce nutrient losses to a set level then longer than 10 years consent is needed. Lake Taupo farms have a 25 year consent so why not the river.</p>	<p>Consent terms for substantial environmental infrastructure should be the same for all industries to encourage further investment.</p> <p>Policy 13 a,b,c. should apply to all.</p>
<p><b>Farm Environment Plans</b></p> <p>Policy 2, Rule 3.11.5.3, 3.11.5.4, Schedule 1</p>	<p>Support with amendments</p>	<p>The impact of this and how farmers will be placed is very subjective and uncertain for farmers. We require more certainty in what will be required to be done.</p>	<p>Provide clear certainty of what will be a requirement</p>

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Yours sincerely  
Peter Arthur Kidd.

*P A Kidd*

*March 5<sup>th</sup> 2017*

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Signature

Date