

**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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*Complete the following*

**Full Name(s):**  
**Phillip and Pauline Gaudin**

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

**We do not wish to speak at the hearing in support of our submissions.**

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P G Gaudin 4/3/17

Signature  date

P M Gaudin 4/3/17

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.

We are Sheep and Beef farmers in Aria in the Mokau River Catchment so currently we are not in the proposed plan. As Hill Country Farmers we wish for our submissions to be heard in support of others.

This family has been farming here since 1973 and we have 6500 Stock Units farmed over 650 Ha (effective).

Recently we've undertaken work with the support of WRC through the Catchment New Works and the Hill Country Erosion Fund. Poplar trees (x1000) have been planted and Native Bush and Wetlands have been retired. This is in addition to fencing off streams, installing water reticulations systems and stability plantings previously undertaken, over the years at our own expense. We plan to continue this work whilst maintaining current levels of production. Judicious fertiliser use with very little Nitrogen application and using Low Release Phosphate over the years has been our policy. We have major concerns that a reduction in these application rates will have a massive effect on our production and therefore our viability.

## 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
Objective 1 & Table 3.11-1	Support but require amendments	We support the long term restoration and protection of our waterways, however we're concerned the targets may not be achievable.	<i>We seek to Amend Table 3.11-1 so that water quality targets are achievable and realistic. To fully achieve Objective 1 and table 3.11-1 's 80 year targets, means that reaching Objectives 2 and 4 will be highly unlikely.</i>
Policy 4 Rules 3.11.5.1 & 3.11.5.2  <i>Permitted activity rules</i>	Oppose	These rules are not consistent with Policy 4 in that the continuation and flexibility of small and low risk farming is not provided for.	We seek to Amend rules 3.11.5.1, and 3.11.5.2:  1. Incorporate into one rule  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  3. Relate stocking rate or/and nitrogen discharge to the natural capital of soils for sustainable production/ farming;  4. Delete 6 stock unit standard

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			<p>5. Delete 4.1 hectares and provide for up to 20 hectares</p> <p>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</p> <p>7. Enable flexibility in land use, discharges, and stocking rates up to these standards</p> <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</p> <p>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>

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<p><i>Policy 6 Rule 3.11.5.7 and any relevant points within the plan.</i></p> <p><i>Restricting Land Use Change.</i></p>	Oppose	<p>This affects the value of our land and will also have major economic impacts on our future viability. Because we are supplying globally we need to have the flexibility to make changes to meet these markets .</p>	<p>We seek that this should be deleted completely. It would be more suitable to use a Farm Environment Plan which considers each individual farm capabilities.</p>
<p><i>Policy 2 &amp; 7 Rules 3.11.5.2 to 3.11.5.7</i></p> <p><i>Nitrogen Management Application of the NRP</i></p>	Oppose	<p>We oppose this grandparenting approach (holding users to their Nitrogen Reference Point). Low emitters are being penalised while the large users may continue to pollute. There is no scientific evidence that a blanket rule for nitrogen restriction will be of any benefit. Our fertiliser history shows that we have always had a cautious approach to N and P application so we would be punished for trying to do the right thing.</p> <p>It penalises the low emitters like us – who will no longer be able to develop our farms (we may develop but will be unable to stock them with these rules) to help pay for the cost of mitigating against the other contaminants.</p> <p>We oppose the use of Overseer as a means of determining the NRP –it was not designed for this purpose and the inaccuracies from the assumptions made make the information far less than perfect.</p>	<p>We seek that the Nitrogen Reference Point and use of OVERSEER are removed from the plan in their entirety.</p> <p>We say adopt a sub-catchment approach to addressing contaminants that are relevant to each farm.</p> <p>Soil type and fertiliser history should be taken into account when determining nitrogen discharges from a property.</p> <p>Use FEP's to determine what would work best on each farm, and science to determine which contaminants are an issue in each sub-catchment</p> <p>We seek that the rules are amended so that they are effects and science based. Grandparenting (holding us to historical land uses ,leaching rates,and stocking rates)is not the answer.</p>

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		The NRP values were chosen in drought years so stocking rates were a lot lower – which restricts stock numbers going forward.	
3.11.4.5 Sub-catchment scale planning	We support with amendments.	Our farm has no waterways entering it (watershed), so the idea of this sub catchment approach and monitoring would be ideal. Each farm and subcatchment group would then take responsibility.	<p>We seek that scientific data is needed to identify contaminants causing decline in water quality ,before any implementation, in each sub catchment.</p> <p>Objectives to be amended or replaced to enable Sub Catchment Groups to manage their land and water resources.</p>
<p>Policy 3 &amp; 4 Rules 3.11.5.1 to 3.11.5.4 and Schedule C.</p> <p>Stock exclusion.</p>	Oppose	<p>This does not support Objective 2 of the Plan as the consequences would be socially and economically devastating for farming communities.</p> <p>Most of our farm is classed either 6e or 7e and to fence off any unfenced waterways would be financially crippling and near impossible. Water reticulation systems are in place and spending on planned extensions to these would make better financial sense.</p> <p>Banks will not be willing to finance this fencing when there is no return on the investment.</p>	<p>We seek to change the Stock Exclusion Requirements and Fencing Slope Requirements to no greater than 15 deg as per just released Clean Water Report Feb 2017.</p> <p>For cattle on land between 3 and 15 deg slope, change the exclusion requirements so that they only apply to all permanently flowing waterways greater than 1m wide.</p> <p>Again, individual FEP's should form the basis of this Plan .</p> <p>Waikato Regional Council along with central Government assistance should</p>

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
			<p>continue to subsidise any waterway fencing as is currently being done in our catchment.</p> <p>Actively managing stock across waterways should be allowed but limited.</p>
<p><i>Removal of North Eastern (Hauraki) portion of plan.</i></p>	<p>Oppose</p>	<p>This removal of a major area within the lower catchment from PC1 creates too much uncertainty and inequality.</p>	<p>We seek that the Plan should be withdrawn or put on hold until all areas are included.</p>
<p><i>Farm Environment Plans</i> <i>Policy 2 Rules 3.11.5.1 - 3.11.5.7</i> <i>Schedule 1</i></p>	<p>Support with Amendments</p>	<p>The idea and intentions of using FEP's to identify areas of concern (if any) are preferable compared to a one size fits all approach. However some of the rules are unrealistic as are the time frames.</p>	<p>We seek that the Plan Utilises the Clean Water Report (Feb 2017) for stock exclusion rules .</p> <p>Rules should be aimed at not penalizing extensive agriculture but focused on reducing impacts from intensive agriculture.</p> <p>Remove timeframes and individualise through consultation with farmers. Farmers should be in charge of their own FEP but with input from WRC.</p>
<p><i>Policy 16</i></p>	<p>Oppose</p>	<p>Oppose this because the ownership of the land should not make any difference as to who follows the rules. The issues are the same for everyone.</p>	<p>We seek that this policy is removed.</p>

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:

Yours sincerely

Philip and Pauline Gaudin

*Philip Gaudin* 4/3/17

Signature

*PG Gaudin*

4 Mar 17

Date