

**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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Private bag 3038  
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*Complete the following*

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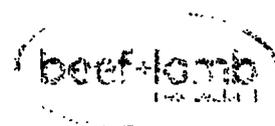
**Email:** krisandphil.neal@gmail.com

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.**

  
\_\_\_\_\_  
**Signature**

5/3/17  
\_\_\_\_\_  
**date**



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

### **Introduction**

My name is Phil Neal and together with my wife Kristin and my parents Murray and Trish Neal, we form the farming entity Neal Farming Limited. We have three young children who we hope will have an opportunity to continue to be involved in the future.

We are a sheep and beef property with a land area of 913ha in total, located 10 minutes south of Te Kuiti. We have both the Magaokewa and Mahorahora rivers running through the property along with many other natural water sources and we regularly swim and fish in these.

The Farm was originally purchased by my grandfather in 1960 and was at that time covered in native scrub, cut over bush and gorse, and was considered too hard to farm by the previous owners.

Over years of hard work by my family, the land has been transformed into productive pasture for sheep and beef cattle to thrive, sustaining a living for all family. We have employed many workers over time and utilised countless local services in doing so. We take pride in our farming practices and are always conscious of minimising our impacts on the environment.

Plan Change One (PC1) is of grave concern to me although the vision of healthy rivers and waterways is still very important. Under PC1 as it stands the implications that it could have on our farming business are such that the costs involved in becoming compliant would lead to higher borrowing levels from banks, reduced equity and a high degree of uncertainty for the future. This uncertainty and overbearing costs hanging over a business can only lead to our farm becoming unworkable and non-bankable.

We are currently in the process of farm succession with my parents. With PC1 this process will stand still and we may not be able to achieve the end result of farm ownership thus the sale of the farm and a loss of several generations work and a family legacy. With the sale of the farm, the possibility of corporate or overseas purchasers would be likely. They are unlikely to care for the land in the same manner as we do as they would lack the personal connection. Plan Change 1's aspirational goals are irrelevant if we are forced from our land and are no longer able to enjoy the rivers on our doorstep.

## 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.

<p><b>The specific provisions my submission relates to are:</b></p> <p><b>State specifically what Objective, Policy, Rule, map, glossary, or issue you are referring to.</b></p>	<p><b>My submission is that:</b></p> <p><b>State:</b></p> <ul style="list-style-type: none"> <li>• <b>whether you support, or oppose each provision listed in column 1;</b></li> <li>• <b>brief reasons for your views.</b></li> </ul>	<p><b>The decision I would like the Waikato Regional Council to make is:</b></p> <p><b>Give:</b></p> <ul style="list-style-type: none"> <li>• <b>precise details of the outcomes you would like to see for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you seek</b></li> </ul>
<p><i>Objective 1</i> <i>Long Term restoration and protection of water quality for each sub catchment and freshwater management unit</i></p>	<p>Yes we support this objective.</p>	
<p><i>Objective 2</i> <i>Social, economic and cultural wellbeing is maintained in the long term</i></p>	<p>Yes we support the objective – however the possible economic and social consequences have not been fully investigated.</p>	
<p><i>Objective 3</i> <i>Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and freshwater management unit</i></p>	<p>Yes we support the objective – however require greater scientific data on sub-catchment freshwater measurements.</p>	

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

<p><i>Objective 4</i> <i>People and community resilience</i></p>	<p>We support this objective – however under PC1 in its current form, we feel that it is of detriment to people and community resilience through considerable costs and great uncertainty for the future generations. As mentioned previously, more scientific data is required for each sub-catchment area to then be able to base outcomes and remedies on as required.</p>	
<p><i>Objective 5</i> <i>Mana Tangata- protecting and restoring Tangata Whenua values</i></p>	<p>We do not support this objective. The rules should be equal for all land owners.</p>	

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

<p><i>Policy 1</i>  <i>Manage diffuse discharges of nitrogen, phosphorous, sediment and microbial pathogens</i>  <i>Section C - progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes</i></p>	<p>We oppose section C of this policy for low discharge farming activities. We believe the costs associated with excluding livestock from the water ways in section C are too great and the water quality gains from this would be minimal given the low intensity farming activity.</p>	<p>We seek that section C be amended to exclude low intensity farming.</p>
<p><i>Policy 2</i>  <i>Tailored approach to reducing diffuse discharges from farming activities.</i></p>	<p>We oppose this policy because it is solely targeted at farming activities only and point source discharges are not included</p>	<p>We seek that this policy is amended to include all discharges of contaminants so that water quality improvements can be made as a whole community</p>
<p><i>Policy 4</i>  <i>Enabling activities with lower discharges to continue to be established while signaling further change may be required in the future</i></p>		<p>Greater definition is required for what is low discharging. This would give greater certainty for the future.</p>
<p><i>Policy 5</i>  <i>Staged approach</i></p>	<p>We support this policy but the staged approach needs to be on a sub-catchment level.</p>	
<p><i>Policy 6</i>  <i>Restricting land use change</i></p>	<p>We support the policy in principle however the policy disadvantages low emitting farming operations by restricting their land use while other high emitters surrounding them are able to continue.</p>	<p>We seek that policy 6 is amended so that provisions are made for low emitters surrounded by high emitters</p>

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

<p><i>Policy 8</i> <i>Prioritised implementation</i></p>	<p>Yes we support prioritised implementation however greater monitoring sites are required to truly define problematic areas in sub-catchments</p>	
<p><i>Policy 9</i> <i>Sub-catchment (including edge of field), mitigation planning, co-ordination and funding.</i></p>	<p>Yes we support this policy and are already undertaking actions towards this i.e. water systems and retiring of land.</p>	<p>Greater access and ease of funding for future mitigation projects on farm is required.</p>
<p><i>Policy 10</i> <i>Provide for point source discharges of regional significance.</i></p>	<p>We oppose this policy as all sources of discharges into water ways should be treated equally.</p> <p>Agriculture in the Waikato is of huge regional significance but is not recognized and provided for under PC1.</p>	<p>We seek that all industry is treated equally and any resource consents held be reviewed.</p>
<p><i>Policy 11</i> <i>Application of best practicable option and mitigation or offset of effects to point source discharges.</i></p>	<p>We oppose this policy as it provides for polluters to keep polluting therefore undoing the work that the rest of us are doing for Healthy Rivers.</p> <p>Offsetting in a separate sub-catchment has no gains to our local rivers.</p> <p>All consents need to meet the same criteria, be they point source or diffuse discharges.</p>	
<p><i>Policy 12</i> <i>Additional consideration for point source discharges in relation to water quality targets</i></p>	<p>We oppose this policy as it only applies to point source discharges.</p> <p>Under section d, it is recognized that there is a diminishing return on investment in respect to water quality achieved. On farm under PC1, huge investments are required for possibly marginal water quality improvements, but this is acceptable.</p>	<p>We seek policy 12 be equal for both point source and diffuse.</p>

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

<p><i>Policy 13</i> <i>Point sources consent duration</i></p>	<p>We oppose this policy completely as it is not equal to all. Point source discharges are provided with longer periods of duration than diffuse discharges.</p>	<p>We seek that Point Source consent duration be shortened</p>
<p><i>Policy 16</i> <i>Flexibility for development of land returned under Te Tiriti O Waitangi settlements and multiple owned Maori land.</i></p>	<p>We oppose this policy as all land owners should be governed by the same rules. Otherwise the development of some land would undermine the water quality gains made by others.</p>	<p>We seek that this policy be removed</p>

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

<p><i>Implementation Methods</i> 3.11.4.2 Certified Industry Scheme</p>	<p>We support this implementation method</p>	
<p><i>Implementation Methods</i> 3.11.4.3 Farm Environment Plans</p>	<p>We support this implementation method</p>	
<p><i>Implementation Methods</i> 3.11.4.5 Sub-catchment scale planning</p>	<p>We support this implementation method</p>	
<p><i>Implementation Methods</i> 3.11.4.6 Funding and implementation</p>	<p>We support this implementation method</p>	
<p><i>Implementation Methods</i> 3.11.4.7 Information needs to support any future allocation</p>	<p>We support this implementation method but require greater number of sites for sub-catchment data collection</p>	

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

<p><i>Rules</i>  <b>3.11.5.4 Controlled Activity Rule – farming activities with a farm environment plan not under a certified industry scheme</b></p>	<p>We oppose this rule for the following reasons:</p> <p>Exclusion of livestock from water bodies as required by schedule C. Under this schedule, the amount of fencing and upkeep is financially and physically unachievable. To install suggested fencing required, needs extensive earthworks which would inevitably lead to greater sources of erosion and therefore sediment and other contaminants entering waterways.</p> <p>We oppose the nitrogen reference point as having one restricts flexibility within our business.</p> <p>We oppose that the property is registered with Regional Council in conformance with schedule A. and that a Farm Environment Plan is also prepared in conformance with schedule 1. This is because of the doubling up of information required – leading to greater workload and expenses.</p>	<p>We seek that 0-15 degree slope be fenced to exclude livestock. 15-25 degree slope and above, use of other mitigation methods used to reduce contaminants which would be outlined in farm environment plans.</p> <p>We seek that this rule be removed</p> <p>We seek that the information required under the registration of the property with WRC, be covered within the Farm Environment Plan.</p>
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**WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS**

<p><i>Schedule A Registration with Waikato Regional Council</i></p>	<p>We oppose in part to schedule A as WRC would already have access to information relative to properties and the doubling up of other information found in Farm Environment Plans as required in schedule 1.</p>	<p>As mentioned previously, all farm or enterprise details should be covered under Farm Environment Plans.</p>
<p><i>Schedule B Nitrogen Reference Point</i></p>	<p>We oppose Schedule B as we feel that an NRP is a form of Grandparenting which allows high emitters of N to continue to do so while at the expense of flexibility and profitability of low N emitters.</p> <p>For our business having a NRP will not allow us to increase production to offset continually rising costs. Also with our circumstances of farm succession, the ability to increase our shareholding in the family business is jeopardised.</p> <p>For properties with low NRPs the value of their land will be reduced compared to surrounding farms with higher NRPs.</p>	<p>We seek Schedule B be removed.</p> <p>We seek Schedule B be removed.</p> <p>We seek Schedule B be removed. We also seek to see the use of Overseer removed as it was not designed as a regulatory tool.</p>
<p><i>Schedule C Stock Exclusion</i></p>	<p>We oppose total stock exclusion from all waterways for slopes above 15 degrees, as fencing all these waterways on our land is financially and physically unachievable. For our property approximately 30km of fencing would be required along with making some areas sheep only. The extensive earthworks required will have a negative environmental impact as previously mentioned. Fencing would require large costs and inevitable borrowing from banks to cover with no financial gain and reduction in equity. Along with these costs because of the exclusion from waterways, we are already spending considerable amounts on the installation of water reticulation systems. The cost of this is approximately \$500/Ha – totaling</p>	<p>We seek that the fencing of slopes above 15 degrees be removed from the schedule. We seek that there be financial assistance to help with other required fencing/water reticulation. We seek that Farm Environment Plans could outline other possible mitigations.</p>

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

	<p>\$400,000. Trying to finance the proposed fencing on top of this is not manageable especially if we are not able to increase productivity to offset costs.</p>	
<p><i>Schedule 1. Requirement for Farm Environment Plans.</i></p>	<p>We support Schedule 1. But require greater sub-catchment monitoring to help guide requirements for the plans.</p>	
<p><i>Schedule 2. Certification of industry schemes.</i></p>	<p>We support this schedule</p>	

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Yours sincerely

Name (Print)

Phillip Neal

Name (Print)

KRISTIN NEAL



5/3/17

Signature

Date



5/3/17.

Signature

Date