

**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

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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

Signature



Date

8-3-2017

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

Introduction

I currently live and farm a small 100acre farm just outside of Piopio, and have a 50% shareholding in a 1400-acre farm 10 km south of Piopio. Both farms are a combination of flats rolling hills and steeper sidling's. Both farms run predominantly cattle with some sheep for the steeper country.

Also in addition to having ownership in these two farms I also own vet clinics in Te Kuiti and Piopio, so have a great understanding of farming and farming practices in the Waitomo district.

I support and I know many of my client farmers in the Waitomo district support the idea of cleaner streams, and several us have already instigated some change on our farms. This has included some stream side fencing where we feel it would be appropriate and practicable, as well restoring and creating ponds and wetlands to control silt run off.

I am also a keen trout fisherman and have been for 40 or more years. Because of this I have a clear understanding of the aquatic environment. It must be said that trout are to be found in abundance in all local streams and can even be found in the Waikato river downstream of Hamilton (as I understand it, it's not the water quality of the Waikato river downstream of Hamilton but rather water temperature that is the limiting factor for trout.)

As I see it, the finger seems to be pointed at upstream sheep and beef farmers, who on the whole are more in tune with the natural environment than some others further down river. There is very little mention in the plan about the effects of road runoff, human waste water, storm water runoff from towns and cities, as well other industrial or domestic contamination.

The plan would appear to be blunt instrument, that tries to deal with a complex natural environment that is not well understood. The tools employed such as overseer are inaccurate and not designed for the job, and the science behind the natural environment is incomplete so any conclusions will be inaccurate, and if implementation is enacted on their assumptions there is no guarantee that improvements in water quality will be made, in fact it could go the other way.

Communities in the head waters of rivers are usually small as is the case in most of Waitomo. Any adverse impact on the profitability of farming business will have an adverse impact on local populations and towns. Once these towns decline they are unlikely to revive.

Therefore I oppose the Regional Plan 1 in its current state.

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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:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
Proposed Waikato Regional Plan Change 1 Waikato and Waipa catchments.	I oppose the plan in its present state	<p>There is immense uncertainty generated by the plan in its present state. If enacted in its present state it will adversely impact on the lives of all rural people whether they involved directly in farming or not.</p> <p>Rural values will surely decline, which will impact rural peoples choices in life and retirement.</p>	This plan in its current state should be rejected until there is a broader agreement between all stake holders.
Nitrogen Reference point	I oppose	<ul style="list-style-type: none"> The nitrogen reference point relies on Overseer which has not been designed with regulation in mind. Even those that are confident in the use of Overseer will admit to an error plus or minus of 30%. This is not the tool that should determine the viability of farming or not. 	Overseer should not be used until the science/modelling behind has an error rate of less than 5% on all soil types and topography.

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		<ul style="list-style-type: none"> • Nitrogen reference points will be based on historical discharge. This will penalize the low discharge farms and reward the polluters, not matter how you word it. So those that have been traditional overstocked and do a lot of cropping will have a higher reference point than others. This reference point will determine the value of land. So as an example, (and we have this situation in Waitomo), you have 4 farms along the road with similar soil type and topography. The first a Sheep and beef farm with a traditional structure, the second a class 2 dairy farm, the third a class 4 dairy farm and the fourth a sheep and beef farm owned by a Maori trust. All will be treated differently under the present plan • If N reference points are set in stone then presently low dischargers will be unfairly penalized. Drystock farming is a variable game, with frequent changes in stock policy depending on the market and climate. Restriction on adaptability will bankrupt some farming enterprises, as it is a precarious game already. It will also reduce the capital value of most properties. 	<p>Rather than historical reference points, nitrogen discharge allowances should be based on land use capability, which would be much equitable system. NZ is known for its fairness?</p> <p>Of course, nitrogen discharge must be measured more accurately than it is now.</p> <p>A higher reference point for low polluters or N based on land use capability will restore adaptability, and therefore profitability.</p>

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Restricting Land Use change	I oppose without financial compensation	<ul style="list-style-type: none"> • Farming is a long-term game. Decisions made 20 years ago, such as planting trees should not be irreversible. Trees may no longer be the most economical use of that land. • Putting in the urban reality it's a bit like buying a 4-bedroom house and then being told you are only allowed a 3-bedroom house and you will have to remove the 4th bedroom. The capital value of the house will decline. Is this fair? 	Adopt a land use capability model for nitrogen. Make everyone bear the burden of reducing nitrogen, rather than the already low N dischargers.
All catchments treated the same	Each catchment is different in many ways. They should be treated independently, but in recognition of the whole	In some catchments nitrogen discharge is the issue whereas in others sediment is the issue. Measure each sub catchment according to the issue at hand for that catchment.	I seek a more targeted reference point for each sub catchment whether it is for nitrogen or sediment.

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Stock Exclusion	I support this in principle	<p>The principles outlined are reasonable. No one wants to see cows standing in the stream defecating.</p> <p>However, all streams of any size don't need to be fenced to their boundary to achieve this. Certain paddocks can be reserved for sheep or goats, and troughed water could be available.</p> <p>In the Waitomo fencing to the edge of very small streams creates a blackberry patch that soon overcomes electric fences that are erected. These margins then become a reservoir for birds and other pests.</p>	Allow stock exclusion through stocking policy. A lot of farmers are already doing this
Slope	I oppose	Some paddocks have varying degrees of slope. Is it the highest degree of slope or the average degree of slope? This could end up a bureaucratic nightmare, and what do bureaucrats know about ecology or farming.	<p>Suggest stocking policies per season on paddocks with average degrees of slope. Most farmers employ this method now.</p> <p>Most farmers would not place large or any cattle on very steep land over winter when erosion could be a problem.</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>They would however rotate stock classes through this land at suitable times of the year to ensure reduced parasite burdens. Water quality is import and we recognize this however there are also other drivers in farming such as animal husbandry and welfare.</p>