

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

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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.



R R sherlock _____ 8/3/2017

Signature

date

SUBMISSION POINTS: General comments

I am a director of a farming operation that owns a recently purchased drystock farm of 490ha in SC16 Priority 1, and a further unit of 660ha at Waingaro that is not subject to PC1.

My wife and I farmed the Waingaro farm, a hard hill country block, until 2014 having purchased it from the family in 1975. In 2014 it was sold to the next generation.

The aim was always to have a strong economic enterprise. This involved establishing strong well managed pastures to provide feed for the stock with minimal seasonal variation, maximum competition for weed species and minimising erosion losses. Other strategies to help these aims and dictated by the nature of the country was to run a higher ratio of sheep to cattle and achieve higher rates of subdivision than would be typical on this type of country (84 paddocks for 585 effective ha). Pastures are rotationally grazed for the greater part of the year. Since 1980 there was only 1 year (2008 75%) when full maintenance fertiliser was not applied to the grazed area.

In spite of this there would be extensive slumping erosion where the small areas of valuable ash country transitioned to the steeper sedimentary derived soils. Through an agreement with the Waikato Valley Authority (registered against the land titles) we had help with the materials for planting and fencing these areas in the late 1970's and early 1980's. Over time this has been extended.

Five separate areas of native bush have been fenced to exclude stock amounting to 46ha.

Recently purchased property, October 2016 is generally better unit with more easier contour land with good andesitic ash soils. However in recent years it has been farmed below its potential. An earlier owner has created a QEII Trust of one native bush area and fenced off 2 additional bush areas. Various gully bottom areas have been fenced off creating a lakes and wetlands which provide a 'filter' for the run-off from the surrounding land.

I support the aspiration of PC1 to sustainably improve the quality of our rivers. I applaud the concept and efforts of the Collaborative Stake Holders Group. However for livestock farmers in particular, the outcome as set out in PC1 creates an environment of unsustainable uncertainty both in terms of interpretation of rules and requirements now and what further impediments may be imposed in the future. This group appears singled out to bear the brunt of provisions which may sound appealing and/or are based on best estimates most often with very large error limits.

An important question for us is to know whether or not these proposed provisions for PC1 will be eventually expanded to include the remainder of the Waikato Region.

Our local community school with a role between 35 and 45 pupils, celebrates 125 year this year. There are some 4th generation children on the role. If these rules are implemented as set out there will be no Waingaro School 15 years from now. I advocate a more measured approach where science and experience with practices are given time to show the way.

I support the submission that has been lodged by Federated Farmers. I am particularly concerned about the following aspects of Plan Change 1:

- The significant negative effect on rural communities
- The cost and practicality of the rules.
- The effect that the Nitrogen Reference Point will have on my business and my economic wellbeing.
- The Farm Environment plan requirements leading to unnecessary and costly regulation of inputs, outputs, normal farming activity and business information

- The costs and practicality of the rules and requirements for stock exclusion, the Nitrogen Reference Point and the Farm Environment Plan.
- The timeframes for complying with the Nitrogen Reference Point rules which are too short and unachievable
- The plan significantly exceeding the 10 year targets in many attributes and areas
- The lack of science and monitoring at the sub catchments level

I wish to be heard at the Hearing.

I am concerned about the implications all of this will have for the above properties and for the current activities as described above. I set out my concerns more specifically in the table below.

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>The specific provisions my submission relates to are:</p> <p>State specifically what Objective, Policy, Rule, map, glossary, or issue you are referring to.</p>	<p>My submission is that:</p> <p>State:</p> <ul style="list-style-type: none"> • whether you support, or oppose each provision listed in column 1; • brief reasons for your views. 		<p>The decision I would like the Waikato Regional Council to make is:</p> <p>Give:</p> <ul style="list-style-type: none"> • 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
	<p>SUPPORT / OPPOSE</p>	<p>REASON</p>	<p>RELIEF SOUGHT</p>
<p>Long Term Land Use Objectives 1, 3, 4</p> <p>Policy 5, 7</p> <p>Rules 3.11.5.3 to 3.11.5.5</p> <p>Schedule 1.</p>	<p>Oppose</p>	<p>The reasons for this are:</p> <ul style="list-style-type: none"> • There is insufficient clarity of how rules will be applied now and at future stages. This creates unacceptable uncertainty and risk eg after spending capital and effort fencing streams at a future stage the area is required to be retired to forestry. • There is no compensation for retiring land or help to met hefty capital costs of establishing fences or forestry. • Presentation of scientific justification for specific rules is at best scant. • Potential capital devaluation 	<p>I seek that the provision is: amended as set out below <i>(delete as required)</i></p> <p>As an alternative I propose</p> <ul style="list-style-type: none"> • This plan needs to be renotified once there is a clear indication of future rules

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>Nitrogen Reference Point Objectives 1, 4</i></p> <p><i>Policy 2, 7</i></p> <p><i>Rules 3.11.5.3 to 3.11.5.7</i></p> <p><i>Schedule 1</i></p>	Oppose	<p>The reasons for this are:</p> <ul style="list-style-type: none"> This is based on grandparenting which immediately creates injustices in allocating farming rights. The amount of allowed N should be based on the characteristics of the farm's soils and the sub-catchment it is located in. The Kerr road property was purchased in October 2016. The nitrogen reference point will be determined by the properties stocking in 2014/5 or 2015/16. It was being farmed below its potential at this stage but this sets its stocking for the future. This limits the farm's ability to meet its other emissions which are likely to be more significant than N, for a farm of this type in this sub-catchment. 	<p>I seek that the provision is amended as set out below</p> <p>As an alternative I propose</p> <ul style="list-style-type: none"> Remove the grandparenting approach Nitrogen emissions should be at a sub-catchment level eg look at the individual catchment and determine levels on what the problem is. Not a blanket approach. Set a band that all emitters have to adhere to. This is then equitable for all emitters whether low or high
<p>Stock Exclusion</p> <p>Rule 3.11.5.1 to 3.11.5.4 (inclusive)</p>	Support if amended to align with NPSFW	<p>The reasons for this are:</p> <ul style="list-style-type: none"> On a lot of hill-country the rules as proposed are difficult to interpret and impractical to implement. It is doubtful whether they would deliver a result commensurate with the cost and effort to build and then maintain the fences as required. 	<p>We seek that the provision be amended as set out below:</p> <ul style="list-style-type: none"> NPSFW should be adopted as the standard.

		<ul style="list-style-type: none"> • In the proposed rules what constitutes 'continual surface water'? 'Always', or 'except in a drought', 'a 20 year drought' or 'at the 95 percentile' etc? • How is 'slope' determined for hill country rivers? One side may, according to the rule, require fencing but the other steep enough not to. So is it to be fenced? Also, as you move along the river the slopes may vary hugely. • Many of the "lines' required to fence these rivers will be inaccessible to tractors and must be achieved manually. • Even grazing will be affected as stock will less easily 'work' the paddock. • The rule not excluding sheep is an essential minimum. 	<ul style="list-style-type: none"> • The rules should be worded to allow for alternative measures that achieve the same or acceptable result.
<p>Restriction Land Use Pages 15-16</p> <p>Policy 6 Rule 3.11.5.7</p>	Oppose	<p>The reasons for this are:</p> <ul style="list-style-type: none"> • It will devalue our land as it caps the productivity. The new farm neighbours a dairy farm. Some limited flats are contiguous with that farm but are on the other side of a river through our property. This makes 'sensible' land use unduly difficult. • It caps the region's productivity as farms cannot be used in differing manners. • Reduces seasonal flexibility • It is not relevant as it is captured in other provisions of the proposed PC1. 	<p>We seek that the provision be deleted in its entirety.</p>

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>Farm Environmental Plans Pages 15 and 16 Policy 2 Rules 3.11.5.3 -3.11.5.7 Schedule 1</p>	<p>Support but require amendments</p>	<p>The reasons for this are:</p> <ul style="list-style-type: none"> • It is too expensive to make changes or manage • Concerned at what the cost of administering this whole process may mean to a farmer and to Regional Council rates 	<p>I seek that the provision is amended as set out below</p> <p>As an alternative I propose</p> <ul style="list-style-type: none"> • That farmers should be able to manage /amend or change the environmental plan with this being audited only. • Allow for other amendments that arise from the submission process.
<p>Containment Loss From Farm Objective 1 and 3 Policy 1,2,4,7 Rules 3.11.5.3 -3.11.5.7 Schedule Table 11-1</p>	<p>Support but require amendments.</p>	<p>The reasons for this are:</p> <ul style="list-style-type: none"> • All factors contributing to river water quality should be considered according to their effects ie not be limiting to N, P, silt and bugs. • For the SC16 containing Lake Whangape the contribution that Koi carp make to the water quality needs attended to. 	<p>I seek that the provision is amended as set out below</p> <p>As an alternative I propose:</p> <ul style="list-style-type: none"> • Plan must contain rules that include the consideration of other factors which affect water quality..

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
<i>Subcatchment Management</i> <i>Policy 9</i> <i>3.11.4.1 and 3.11.4.5</i> <i>Implementation Method</i>	Support but require amendments	The reasons for this are: <ul style="list-style-type: none"> Each subcatchment has its own individual issues around water quality. Focusing that community on identifying and solving those issues is likely to achieve more sustainable results 	I seek that the provision is amended as set out below As an alternative I propose <ul style="list-style-type: none"> Allow for an individual subcatchment approach to the rules.

Yours sincerely



Rory Sherlock
Signature

8/3/2017
Date