

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

Submission Form

Submission on a publicly 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
401 Grey Street
Hamilton East
Private bag 3038
Waikato Mail Centre
HAMILTON 3240

Complete the following

Full Name(s): Rob and Tina Macnab

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Phone (wk):

Postal Address: 153 Waimai valley, R D 2 Ngaruawahia

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Postcode: 3794

Email: rob@total-ag.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.

Yes.

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Signature

date

Signature

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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.

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	<p>SUPPORT / OPPOSE</p>	<p>REASON</p>	<p>RELIEF SOUGHT</p>
<p><i>Objective 1</i></p> <p><i>Long term restoration and protection of water quality for each sub-catchment and FMU</i></p>	<p>Support</p>	<p>We would like the next generations to enjoy the freshwater as much as we do.</p>	<p>That the goals are revised so it is plain what the long-term outcomes for farmers will be.</p>

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Introduction

Thank you for the opportunity to submit on the Waikato Regional Councils proposed Plan Change 1.

Our names are Rob & Tina Macnab, children Tegan, Laura and Amelia. Our family have farmed at Waimai for 20 years. To purchase this farm Rob and Tina have made significant personal sacrifices. During our time here, our family has made similar sacrifices of time and money, but regard this as home, with all it entails.

We farm Sheep & Beef on 142ha which mostly falls into the Waimai Stream, a west coast stream. About 11ha (5.6%) of our farm falls to the Lake Whangapae catchment, so are fully captured by this PC1.

The farm at Waimai has been farmed for 130 years. Whilst a productive farm, it lacks scale to be economic. Therefore, we work off farm to support our family.

We have run our farms like many other Farmers; to leave them in a better condition than from when we started our tenure, 20 yrs. so far. We measure this both environmentally and economically. We do not run systems that are detrimental to the physical parameters/ limitations our farm has. Land use capability is something we consider foremost when considering farm policy.

Freshwater quality is very important to us. Our farm has a fully reticulated water system, our nutrient management is backed by sound science and there is a programme of retiring stream areas.

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<p><i>Policy.2.</i></p> <p><i>Tailored approach to reducing diffuse discharges from farming activities</i></p> <p><i>Farm Environment Plans Provision 3.11.4.3</i></p>	<p>Oppose</p> <p>Oppose</p>	<p>2.a. agree with tailored approach, but want it moved to a sub catchment approach, rather than farm level</p> <p>2.b agree, want to see a lot more monitoring points in rivers and the ability to move some around to identify problem areas. (targeted)</p> <p>2.c establish a NRP for the farm for its present policy but the N allowance for a farm to be more flexible for low emitters</p> <p>Farm Environ mat plan for my farm will be meaningless, as it will only cover 5.6% of the farmed area.</p> <p>2.e stock exclusion within 3 years from when farm</p>	<p>Reference to sub-catchment control and governance.</p> <p>Point source emitters included in sub-catchment solutions.</p> <p>Reference to the increase in monitoring quantified.</p> <p>NRP not to be used for a grand parenting solution, but for a reference to start the journey and to be used as a measure so high emitters can begin reduction.</p> <p>Farm Environment Plans only required when 50% of the farm is in the Waikato Waipa Catchment.</p> <p>Change to stick exclusion as stated by national water policy.</p>

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<p>Poicy.5. Staged approach</p>	<p>Support.</p>	<p>environment plan is provided. This is unrealistic in its timeframe.</p> <p>Support this approach in principle however want it to be tailored to a sub catchment approach</p> <p>Provision for timely transparent information and data on progress for each sub-catchment.</p>	<p>Want to see provision for sub-catchment governance reporting periods and targets.</p> <p>Ability for provision in time line of execution to provide for Objectives 2 and 4.</p>
<p>Policy.6. Restricting land use change.</p>	<p>Oppose</p>	<p>Land use is a basic property right.</p> <p>To restrict land use change makes no acknowledgement of new technology and changing markets. There's an ability to alter farming practices within existing farming systems that makes this policy pointless</p>	<p>Land use should be governed within the sub-catchment based on land use capability and natural capital.</p> <p>If it fits within the parameters of the sub-catchments targets/goals, land use change should be consent able.</p>

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<p>Rules. 3.11.5.2. Permitted Activity Rule – other farming activities</p>	<p>Support with clarification.</p>	<p>Pt. 2. The current proposal is impractical and prohibitively expensive for us. We also do not have the resource or capability to meet this standard in the time frame. We would contest the cost benefit.</p> <p>The water in my 11ha disappears into a Tomo, so it is not even sure that it enters the catchment!</p> <p>Pt.3 NRP. We disagree with grand parenting. Resource should be allocated as for Land use capability or natural capital. Grandparenting is the legitimized removal of one's capital to another, in this case from a farmer who has chosen to look after their land and environment, disadvantaged by having their natural capital and right to farm, Nitrogen utilisation, removed (stolen) and given to a polluter. If the polluter chose to capitalize their farm system and pollute they have hopefully been financially rewarded for that risk. That was their personal decision.</p>	<p>Pt 2. Stock exclusion should be as national water policy.</p> <p>Pt.3. amended so grandparenting is not a part of PC.1 in any form. As per Schedule B</p> <p>Remove 4.a and 4.c</p>

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<p>Rules. 3.11.5.4 Controlled Activity Rule Farming activities with a farm environment plan not under a certified scheme.</p>	<p>Support with amendments.</p>	<p>PC1. As schedule A</p> <p>Oppose NRP being used as a form of grandparenting as schedule B.</p> <p>Consent length to 25yrs as for point source discharge consents.</p>	<p>Change to natural capital land use capability regarding sub-catchment capability and clean water parameters.</p> <p>Change consents to 25yr time frame.</p> <p>Only applies to a farm with 50% in the area under Waipa Waikato catchment.</p>

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<p>Rules. 3.11.5.3 Permitted activity rule. Farmers with a farm environment plan under a certified industry scheme.</p>	<p>Support with amendment</p>	<p>Under sub-catchment approach N should be allowed to be leased between properties and only leased on an annual basis requiring FEP consents issued by Sub-catchment board.</p> <p>Grandparenting and the use of the Overseer model is easily gamed and abused.</p> <p>As above oppose stock exclusion as PC 1 proposal.</p> <p>Oppose NRP as a proxy for grandparenting.</p> <p>N leaching and stocking rate be granted in accordance with sub-catchment capability and restrictions, with regard to land use capability or natural capital.</p> <p>As above oppose stock exclusion as proposed in</p>	<p>Pt.3 be amended as to national water policy for stock exclusion</p> <p>Pt.2. be amended as suggested as per schedule B</p> <p>Change to national water accord.</p>

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<p>Rule.3.11.5.7</p> <p>Non-complying activity rule.</p> <p>Rules.</p> <p>Schedule. A.</p> <p>Rules.</p> <p>Schedule. B.</p> <p>Schedule. C.</p> <p>Stock Exclusion.</p>	<p>Oppose</p> <p>Support with clarification.</p> <p>Oppose.</p> <p>Oppose</p>	<p>Sub-catchment governance approach is the best forum to manage land use change. Best land use and land use capability within the catchments capacity. We need to able to adapt take advantage of new technology and changing markets. Forages, virtual fencing.</p> <p>Clarification of definition and dates clause.f.</p> <p>N needs to be monitored but I don't think NRP and its use as a Grandparenting tool is correct.</p> <p>The present proposal is unworkable in a practical sense.</p> <p>We need to be given consents for intermittent stock crossing of streams at fords.</p>	<p>Change to sub-catchment management /governance control.</p> <p>N monitoring is important but priority should be given to the contaminant of most concern in each sub-catchment.</p> <p>Concentrating on best management practice and closer more intensive monitoring of streams and rivers.</p> <p>Change to the National water policy statement on stock exclusion.</p>

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Yours sincerely



1103/2017

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	Support.		
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