

**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
401 Grey Street
Hamilton East
Private bag 3038
Waikato Mail Center
HAMILTON 3240

Full Name(s): Robyn Ethel Clements

Phone (hm): 07 8722872

Phone (wk): 07 8722872

Postal Address: R.D.3, Te Awamutu 3873

Phone (cell): 027 650 6666

Postcode: 3873

Email: reclements@xtra.co.nz

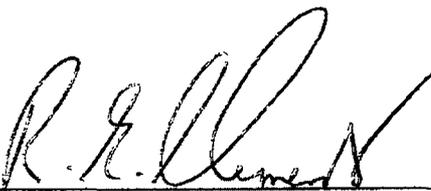
I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

I wish to be heard in support of this submission.

If others make similar submissions, I would consider presenting a joint case with them at the hearing.

R. Clements
Page 1 of 10

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

 8/3/17

Signature date

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.

My name is Robyn Clements and I am a Trustee for the Clements-Stewart Family Trust. The Trust owns a sheep and beef farm in Priority 3 sub catchment located in Waipa River Freshwater management unit (Mangatutu sub catchment). This is a family with four generations of farming history since the late 1800's in the Waikato/King Country, focused in this & neighbouring catchment areas. We run a mixture of beef bulls, sheep and dairy grazers on 364 ha. After the stress of successive droughts we grow 10 ha of crops of turnips and chicory to ensure our stock are well fed since 2014. Topography of farm is a combination of flat, rolling and steep with exposed Rhyolite rock visible in steep sections. We have regenerated native bush combined with two small pine forest lots (approx 25 ha) that we have chosen not to harvest due to potential adverse impact on environment. Each year we have active native planting plan with emphasis on plants that provide feed for local native birds that flourish due to regular food source and successful pest control. We have worked with Waikato Regional Council's predecessor (Environment Waikato) to realign Mangatutu Stream back to it's original course in 2006 investing over \$35,000 of our own funding along with Council in order to improve natural water flow and prevent further erosion of river banks as part of sub catchment plan to improve Mangatutu Stream. This stream is tributary of Punui River and the stream is regarded as a significant trout hatchery. Our hope for the future is that either our son and/or daughter will continue our stewardship of this land with one currently a rural banker and one in Year 2 of animal science degree at Massey.

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 and Policy 5	I support but require amendments	I agree with the vision and strategy for healthier and cleaner rivers but believe the long term impact as proposed creates uncertainty as to whether we have sustainable farming business and therefore one that interests our children to view as viable career investment	I seek that the provision is: amended as set out below A full land use study is conducted that covers the 80 years proposed
Objective 2	I support but require amendments	We rely on local/regional community to provide farm goods/services to enable us to have viable farming business. We also rely on them from social & well being perspective (e.g. had successive droughts for 3 years needing support). I believe the existing analysis lacks substance and does not demonstrate recognition of extended impact Change 1 has on this important objective	I seek provision for a detailed In depth cost benefit analysis (social & economic) with any consequential amendments arising from this submission process
Objective 4	I support but require amendments	We rely on people to staff our farm, provide goods & services. We need a strong (socially & economically) resilient community for us and the people we rely on to interact as human beings. If we are to attract our next generation they need visibility of this strong community where they can	I seek provision for a detailed In depth cost benefit analysis (social and economic) with any consequential amendments arising from this submission process

R. Clements
Page 4 of 10

R. Clements
4/10

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

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		have confidence future generations of farmers can be educated and nurtured to contribute to New Zealand's future	
<p>Rule 3.11.4.5 Sub catchment planning</p>	<p>I support with amendments</p>	<p>Logical and practical ability enabling leadership back to community to identify and address their own issues</p>	<p>I seek provision that any rules relating to farm are amended to include a sub catchment approach with any consequential amendments arising from the submission process</p>
<p>Rule 3.11.5.2 Stocking Rate</p>	<p>I do not support</p>	<p>Preventing stock rate increase for dry stock farms against a base of including drought year ignores opportunity of available feed in typical years to feed NZ and the global population. Existing science demonstrates beef & sheep stock drink less than lactating dairy cows & feed on pasture that less nitrate rich so consequently excrete less so increases in dry stock not prime factor in issues Plan addressing</p>	<p>I seek provision for Rule to recognise difference between lactating dairy cow versus dry stock with consequential flexibility to allow stocking rate to increase on dry stock farm subject to Farm Environment Plan compliance</p> <p>Such amendment(s) to this rule or other relevant rules to be amended where there is any consequential amendments arising from the submission process</p>
<p>Policy 2 & 7 on Page 37; Rules 3.11.5.2 to 3.11.5.7, & Schedule 1 Pages 51-53 & Schedule B – Nitrogen grandparenting</p>	<p>I do not support</p>	<p>I support principle of raising awareness of benefits to water quality by reducing nitrogen & other elements entering waterways but plan relies on modelling formula that not "fit for purpose" (Overseer), particularly dry stock farms. On multi-</p>	<p>I seek provision to delete grandparenting approach in its entirety.</p> <p>If this provision is not passed then I seek to amend these policies, rules &</p>

R. Clements
Page 5 of 10

R. Clements
5/10

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

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
<i>approach</i>		<p>million dollar business it is unacceptable to "hope" science will catch up at some stage to provide accurate scenario model to substitute Overseer. Appears WRC focused on cost of Plan to implement rather than viability long term by selecting Overseer.</p> <p>Also the 2014/15 year used in nitrogen reference point was drought year - an average over 3 years fairer and allows for impact of any changes in farming practices.</p>	<p>schedules to substitute using individual Farm Environment Plans instead of Overseer to determine land use capability and individual farm base discharge allowance</p> <p>Such amendments to these rules and schedules to be amended where there is any consequential amendments arising from submission process</p>
<p><i>Policy 2 & 7 on Page 37; rules 3.11.5.2 to 3.11.5.7 & Schedule 1 Pages 51-53 7 Schedule B continued</i></p> <p><i>Nitrogen Reference Point continued</i></p>	I do not support	<p>No provision in nitrogen reference point to recognise and credit farms that already been environmentally active on farm versus those who have polluted in the past and/or deliberately used excess nitrogen to "game" their figures</p> <p>Restriction on increasing use nitrogen impacts significantly on dry stock farms to have flexibility in future to improve current industry conservative approaches to growing pasture & therefore not able to increase their contribution to feeding NZ & world</p>	<p>I seek provision in these Policies, Rules and Schedules to have Nitrogen reference point grants credit to farms where evidence farming practices have been environmentally active to reduce use of nitrogen and other potential contaminants.</p> <p>I also seek provision for Nitrogen reference points to recognise historic lower use of Nitrogen by beef & sheep farms to dairy and allow prescribed favourable variation for that farm type</p>
Rule 3.11.4.3 – Farm Environment Plans	I support with amendments	Helpful to ensure sustainable environmental consideration & farming practices to match are documented & reviewed	I seek provision Rule amended to allow flexibility to include mitigation approach not prescriptive rules based approach. I seek to extend time line as evidence not sufficient qualified Farm Environment Planners available to meet workload.

R. Clements
Page 6 of 10

R. Clements
6/10

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

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>Objectives 1,3 & 4; Policy 5 and 7, Rules 3.11.5.3 to 3.11.5.5 and Schedule 1</p> <p>Convert farm land back to forestry</p>	<p>I oppose</p>	<p>The Plan's goal of substantial change in current land use back to forestry to deliver better water quality, is silent on what will happen to the water as these forests are progressively felled. On our farm we have chosen not fell a small pine forest lot as we know soil & other water contaminants will wash down into a significant trout hatchery stream, machinery would need cross the same stream for some time each day increasing risk of oil or fuel contaminating stream. Next action would be soil erosion risk washing into water until there is time to establish planting of substitute. When this is multiplied across a vast increase of forestry land I am not convinced that this logic will help water quality. In addition are we going to import food from other countries to make up for the short fall to feed ourselves - and highly likely will be from land of developing nation where economics not environment are prime consideration so again no believe logic that this will help the global environment</p>	<p>I seek that the provision is to delete in its entirety the Policies, Rules and Schedule to convert agricultural land back to forestry.</p> <p>If these Policies, Rules & Schedule are not deleted I seek provision to amend them to using method that looks at land use capability to assess land use</p>
<p>Rules 3.11.5.1 to 3.11.5.4</p> <p>Stock Exclusion</p>	<p>I support with amendments</p>	<p>Agree with intention to exclude stock from water ways to ensure good water quality but need flexibility to allow individual farm approach documented through FEP for dry stock to occasionally be permitted in controlled situation to pass over water ways when land terrain means not practical(physical & economic) to build</p>	<p>Amend blanket approach to exclusion of waterways. Replace to allow individual management approach for non-lactating stock under conditions prescribed in individual farms FEP to protect water ways (e.g. minimal crossings permitted in controlled</p>

R. Clements
Page 7 of 10

7/10
R. Clements

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

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>bridge. On our farm would mean issue with animal welfare due to distance have to walk them to access highly productive part of farm, part of walk have to be on busy road so impact road users from health & safety aspect, plus wear and tear on road</p> <p>Lack of flexibility with fencing any water way requirements not recognise geographic challenges of dry stock farms like ours that include steep and varied land, large areas of solid Rhyolite rock over significantly larger land masses than most dairy units. The costs are prohibitive with money better invested in improving water reticulation on a farm.</p> <p>Should have consistency with national Water Accord which only recommends slopes up to 15 degrees be fenced. Also recommends different definition of a water body than we're comfortable with</p>	<p>situation) so not require retirement of highly productive farm land. Such amendment(s) to these rules or other relevant rules to be amended where there is any consequential amendments arising from the submission process.</p> <p>Change wording to allow exemptions to fencing all waterways where geographic natural barriers and land base as identified in individual farm environment plans.</p> <p>Change the rules to match the National Water Accord</p> <p>Follow the National regulations for stock exclusion that the MOE is working on with any consequential amendments arising from the submission process</p>
<p>Policy 6, Rule 3.11.5.7 Restrict Land use change</p>	<p>I oppose</p>	<p>This restricts future generations to "today's" practices, science and current market needs versus what may be needed to feed the world's growing population in future</p> <p>The value of our farm and others will be impacted negatively as increasing potential productivity and profitability will be significantly restricted by</p>	<p>I seek that the provisions of Policy 6 and Rule 3.11.5.7 is deleted in its entirety</p> <p>That provision be made for method that looks at land use capability to assess land if this Policy and Rule is not deleted</p>

R. Clements
Page 8 of 10

8/10
R. Clements

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

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>any change requiring resource consent and unlikely to be granted unless you want to apply to retire farm land to forestry.</p> <p>The Plan Change has identified there is land it wants to see retired from farming and put back to forestry so there will be less land being farmed. From both economic and environmentally sustainable perspective it means need to have land that is suitable to farm performing to high level to at least maintain New Zealand farmer's ability to feed New Zealand and hopefully some of the global population. Restricting no land use change to non-complying activity will not allow innovation in farming practices and related science to flourish and be implemented</p>	

Yours sincerely

ROBYN E. CLEMENTS
On behalf of Clements-Stewart Family Trust

*R. Clements
Page 9 of 10*

*9/10
R. Clements*

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

 8/3/17

Signature

Date

R. Clements
Page 10 of 10

10/10
R. Clements