

**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.

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

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John O'Leary 1/3/2017
Signature date

Signature date

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Introduction

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

My wife and I are 3rd generation sheep and beef farmers operating 930ha in the Piopio area in partnership with my parents. We have a range of contour on our properties which would allow us to convert to dairying, goat farming, horticulture or intensive dairy support and maize cropping.

Under PC1 these changes in land use which would aid farm in the farm succession become very difficult. Many other young farming families looking to intensify existing operations to increase productivity and profitability in order to purchase their family farms are also in this position

We support council's initiatives, vision and strategy for the Waikato River and other water ways in the region.

In its current form PC1 is nothing short of a good idea. Implementation of a good idea requires "a good plan".

All teams require a successful plan to succeed, in addition the plan must have majority support of the team members. Unfortunately, PC1 has never gained majority support from the CSG or Council.

The closeness of the passing votes from the CSG and council supporting the plan should ring warning bells to those charged with hearing submissions regarding PC1.

We have many areas of concern within the plan that will adversely affect our business and community. A few of these are outlined below.

Thank you for your time considering these matters.

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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
<p><i>Implementation and method</i></p> <p>3.11.4.5</p> <p><i>Sub catchment scale planning page 37</i></p>	I oppose in part	<p>Sub catchment management plan approach empowers the local community to help achieve the objectives of PC1.</p> <p>Sub catchment planning should be left to territorial authorities and local community. This will help generate wider interest and support.</p> <p>Sub catchment planning may help identify poor practice that adversely affects the environment in that area. This behavior is more likely to be modified if it is identified by way a sub catchment group than it is if dealt with at a regional council level.</p>	<p>Amend method 3.11.4.5</p> <p>Make development of sub catchment plans a high priority.</p>
<p>3.11.4.6</p> <p><i>Funding and implementation</i></p>	I oppose in part	<p>The compliance and administration costs associated with implementation of PC1 are very high.</p> <p>Rates in the Waitomo district are already some of</p>	<p>Provide a clearer cost detailing of the implementation of these plans and guarantee that this cost will be shared by all rate payers equally.</p>

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<p>Page 37</p>	<p>the highest in the country and the local Waitomo district council one of the most indebted councils per capita.</p> <p>The cost burden of the implementation and management of PC1 is likely to fall on rural rate payers, so not only are we being restricted in our production but we have to pay for this to be enforced on us.</p>	
<p>3.11.5 Rules</p>	<p>I oppose in part</p> <p>Dates hen preparation of FEP and calculation of NRP are unrealistic.</p> <p>We don't even know who is qualified to certify a FEP is acceptable by council standards.</p>	<p>Change dates required for FEP and NRP may be prepared and calculated once PC1 is operational.</p> <p>Provide clarification as to what constitutes and effective FEP and who is qualified to sign this off.</p>
<p>Rule 3.11.5.7 Non-complying activity rule. Land use change Page 45</p>	<p>Oppose</p> <p>This rule makes land use intensification a non-complying activity.</p> <p>How are young farmers expected to get ahead in business if they can't devote the time and energy that young people have to developing an underperforming farm and transforming it into a sustainable business.</p> <p>This rule is in direct conflict with the challenges laid at farmer's feet to increase production and exports by central government. It will also lead to</p>	<p>Replace this rule with one that allows for the further development and intensification of land and change in its use, providing that a FEP is produced showing that the loss of contaminants will not be greater than that of operations of a similar nature in that area.</p>

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	<p>an increase in the already aging farmer base and stagnate farm production forever.</p> <p>Furthermore, it reduces farm values for retiring farmer who have been content with their production but know there is much unrealized potential in the land that investors may be willing to pay for.</p>	
<p><i>Schedule B Nitrogen Reference points</i></p> <p><i>Page 47</i></p>	<p>Oppose</p> <p>N loss is not a major contaminant loss in our area. However due to high rainfall low stocking rate hill country farms record high N losses.</p> <p>Furthermore, this is essentially grandparenting as these are property specific figures based on historic performance. Implementation of these impacts on possible land use change, succession through family farming and community through loss of young people entering the farming industry.</p> <p>Had council and central government engaged land use capability mapping some time earlier much of the development of high leaching soils into dairy farms would have been avoided.</p>	<p>Remove all reference to nitrogen caps.</p> <p>Land use capability is the most appropriate method of allocating nutrient loss in the and this should be calculated at a sub catchment level.</p>
<p><i>Schedule C</i></p> <p><i>Stock exclusion</i></p> <p><i>Page 50</i></p>	<p>Oppose</p> <p>This rule is too tough and simply impractical on many farms. Fencing off all water ways on hill country farms will cause more sediment loss into the water via mechanical benching required to get a practical fence line. This land 10 degrees and over will erode forever once opened up.</p>	<p>Provide certainty that stock exclusion provisions noted in an approved farm plan will supersede schedule C.</p> <p>Clarify the setback for fences so they are the same for schedule C and in all rules.</p>

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		<p>Furthermore, stock movement/tracking around these fences will create even more fracturing of the soil leading to soil runoff into the waterway especially so on steep land.</p> <p>Stock must have access to some "free water" given intermittent power supply to some outlying farms and time to repair pumps and lines in the event of a failure. Farmers are already obliged under the animal welfare act to provide "water food and shelter" to their animals. The rule places them at risk of inadvertently not for filling these obligations which may result in animal welfare issues.</p> <p>There is no guarantee that once fenced that land above is going to be able to continue to be farmed. Former WRC environmental consultants have made it clear that PC1 is just a soft precursor to the targeted retirement of hill country farms in the region 10 years from now.</p>	<p>Provide exceptions for flood prone areas where fencing is simply impractical and wasteful. i.e No fence but troughed water instead.</p> <p>Provide exceptions to land over 15 degrees where animal welfare / access to drinking water takes precedence over schedule C</p> <p>Provide guidance as to what the councils future plans with regard to farming hill country truly are.</p>
<p><i>Certified Nutrient advisor</i> <i>Page 80</i></p>	<p>Oppose</p>	<p>The definition of a C N A differs from that in the regional plan.</p>	<p>Please clarify what qualifications a C N A has and what will their role be, enforcement, education, application.</p> <p>How many will we need and what will it cost the rate payers.</p>
<p><i>All the above provisions</i></p>			<p>In regard to all the above topics, any consequential and / or similar</p>

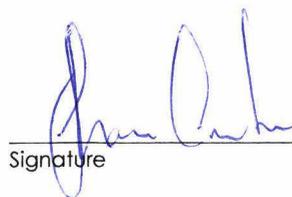
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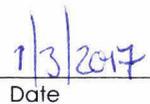
The specific provisions my submission relates to are:	My submission is that:	The decision I would like the Waikato Regional Council to make is:
		amendments to have the same effect.

Yours sincerely

Shaun Carter.

Commented [j1]: If a group. The final signature can be 'signed on behalf of the ... group'.


 Signature


 Date