

**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

*Complete the following*

**Full Name(s):** Simon Douglas Kelton and Adrienne Judith Kelton

**Phone (hm)** 07 8259772

**Postal Address:** 119 Arthur Road, RD5 Hamilton

**Postcode:** 3285

**Email:** kelton@extra.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 do not wish to be heard in support of this submission.**

  


6/3/17

6/03/17

**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.

Our names are Adrienne and Simon Kelton. Our family have farmed our 20 hectare Te Pahu property since 1987, where we have enjoyed a family oriented lifestyle that has included fattening bulls, dairy grazers (cows and heifers) and fattening both dry cows and steers.

In 2004 we purchased a further 20 hectares at Ohaupo to expand our farming business and have grazed dairy heifers and fattened steers on this property since.

Should the proposed plan change proceed in its present form and timeframe the financial impact on our enterprise will be huge and will frustrate our ability to respond to market changes.

Over the years we have undertaken our own environmental mitigation measures (fencing major waterways; establishing amenity and sustainable woodlot plantings) and have endeavoured to be responsible guardians with respect to the environment.

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><b>The specific provisions my submission relates to are:</b></p> <p>State specifically what Objective, Policy, Rule, map, glossary, or issue you are referring to.</p>	<p><b>My submission is that:</b></p> <p><b>State:</b></p> <ul style="list-style-type: none"> <li>• whether you support, or oppose each provision listed in column 1;</li> <li>• brief reasons for your views.</li> </ul>		<p><b>The decision I would like the Waikato Regional Council to make is:</b></p> <p><b>Give:</b></p> <ul style="list-style-type: none"> <li>• 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</li> </ul>
	<p><b>SUPPORT / OPPOSE</b></p>	<p><b>REASON</b></p>	<p><b>RELIEF SOUGHT</b></p>
<p><b>The Plan as a Whole</b></p> <p>Uncertainty to farm in the future</p>	<p>We oppose</p>	<p>Overall this plan provides no security for intergenerational farming to occur.</p> <p>The proposed plan changes introduce too many rules in too short a timeframe that will lead to financial and social distress, through greatly reduced viability of a number of present farming enterprises.</p>	<p>Delete the Plan and replace with a plan which clearly provides a way for farmers to address environmental concerns while maintaining viable and resilient businesses that future generations can be part of.</p>
<p><i>Objective 1 and Policy 5</i></p>	<p>We support Objective 1</p>	<p>The reasons for this are:</p> <p>We agree with the vision and strategy for cleaner healthier rivers,</p> <p>But are concerned with how the longer-term plan changes will affect our small farming business. We have built up our enterprise by making considered, well intentioned investment</p>	<p>We seek that the provision is: amended as set out below</p> <p>As an alternative I propose</p> <p>A full land use study done that covers the 80 years.</p>

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		<p>decisions with certainty. In its current form the proposed changes provide no certainty.</p>	
<p>Farm Environment Plans Provision 3.11.5.3 – 3.11.5.7</p>	<p>We oppose</p>	<p>The reasons for this are:</p> <ul style="list-style-type: none"> <li>Requiring a certified FEP is likely to cost between \$3000- \$5000, which is a huge cost given the scale of our farming platform.</li> </ul>	<p>We seek that the provision is removed or amended as follows:</p> <p>As an alternative we propose</p> <ul style="list-style-type: none"> <li>That farm owners be permitted to develop FEPs themselves (to specified standards) and that they be subject to audit.</li> </ul>

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	<p><b>SUPPORT / OPPOSE</b></p>	<p><b>REASON</b></p>	<p><b>RELIEF SOUGHT</b></p>
<p><i>Policy 6 restricting land use change Rule 3:11:5:7</i></p>	<p>We oppose</p>	<p>The reasons for this are:</p> <ul style="list-style-type: none"> <li>• The value of our land and the ability of future generations to develop a farming business is removed.</li> <li>• We feel that this is encompassed by all other rules contained in the plan.</li> <li>• We feel that Land use capability is a better method of assessing land use rather than prohibition.</li> </ul>	<p>We seek that the provision is removed.</p>

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<p><i>Sub Catchment 3:11:4:5</i></p>	<p>We support with amendments.</p>	<ul style="list-style-type: none"> <li>• It gives more leadership back to the community to address their own issues around the 4 contaminants.</li> <li>• It is more likely to achieve the vision of Healthy Rivers than current rules. An example is at Raglan and what they achieved with Whaingaroa Harbourcare.</li> </ul>	<p>We seek the provision is that all the rules that relate to farm level, are amended to include a sub catchment approach with any consequential amendments arising from the submission process.</p>
<p><i>Objective 2 Social Economic and Cultural wellbeing is maintained in the long term.</i></p>	<p>We support with amendments</p>	<ul style="list-style-type: none"> <li>• We want to see a more robust economic analysis completed for this plan change.</li> </ul>	<p>A cost benefit analysis done with any consequential amendments arising from the submission process.</p>

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<p><i>Stock exclusion Rule 3:11:5:1, 3:11:5:2,3:11:5:3,3:11:5:4</i></p>	<p>We support with the following amendments</p>	<ul style="list-style-type: none"> <li>• This doesn't support Objective 2 of the plan.</li> <li>• That the national Water Accord only recommends that slopes up to 15° be fenced, and this should apply.</li> <li>• The timeframe is too short.</li> </ul>	<ul style="list-style-type: none"> <li>• Change the rules to the National Water Accord.</li> <li>• Provide a longer timeframe to achieve.</li> <li>• Provide flexibility with respect to distance fences are set back from waterbodies in accordance with individual FEP.</li> </ul>
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<p><i>Policy 1 and Policy 2 and schedule B regarding Nitrogen Reference Point</i></p> <p><i>Rules 3.11.5.3 – 3.11.5.7</i></p>	<p>We oppose</p>	<p>The reasons for this are:</p> <ul style="list-style-type: none"> <li>• This grand parenting approach totally unfair to low emitters (such as our own drystock enterprise).</li> <li>• It restricts flexibility in our farming operations and our ability to continue to develop our properties over time.</li> <li>• It would be fairer and self –regulating if a standard rate were set for the different farming classes (using Olsen P)</li> </ul>	<p>We seek that the provision is: Deleted in its entirety</p> <p>As an alternative we propose:</p> <ul style="list-style-type: none"> <li>• Remove grandfather clause.</li> <li>• Establish a rule for each class of farming.</li> <li>• Use Olsen P rather than Nitrogen.</li> </ul>

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<p><i>Reducing contaminant losses</i></p> <p>3.11.5.3 – 3.11.5.7</p>	<p>We oppose</p>	<p>Farming is being targeted, whereas there are wide range of contributing factors other than from farming practices.</p> <p>The proposed plan changes make no provision for new (emerging) technologies that may in future be used to mitigate present issues with sediment and other contaminant loss.</p>	<p>Discard blanket rule:</p> <ul style="list-style-type: none"> <li>Determine mitigation measures on a case by case basis</li> </ul>
<p><i>Restricting Land Use Change</i></p> <p>Rule 3.11.5.7</p> <p>Policy 6</p>	<p>We oppose</p>	<p>Restricting land use change would adversely affect our ability to maximise our financial security and meet the challenges of an ever changing economic climate.</p> <ul style="list-style-type: none"> <li>Our immediate neighbour is a dairy farm</li> </ul>	<p>Discard blanket rule:</p> <ul style="list-style-type: none"> <li>Make provision that would allow a property being sold to a neighbour to be farmed to</li> </ul>

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		<ul style="list-style-type: none"> <li>• Our property was originally a dairy farm.</li> </ul> <p>To retain the value of our land we need the option of being able to sell to our neighbour on the basis of being "same use".</p> <p>Being able to take advantage of any new farming opportunities that arise, is essential to our long term viability.</p>	<p>same intensity as that owned by purchaser.</p>
<p>Conversion from farming to forestry</p> <p>Rules 3.11.5.3</p> <p>Policies 5 and 7</p>	<p>We oppose</p>	<p>This introduces long-term uncertainty with respect to being able to make investment and management decisions for the farm.</p>	<p>We seek that an alternative is:</p> <ul style="list-style-type: none"> <li>• Incentivise conversion to forestry/retiring land, rather than through imposition of a rule.</li> </ul>

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Yours sincerely

Printed Name: Simon + Adrienne Kelton



6/3/17



6/03/17

Signature

Date