

**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  
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Private bag 3038  
Waikato Mail Centre  
HAMILTON 3240

*Complete the following*

**Full Name(s): Steve and Toni Morison**

**Phone (hm): 07 8724845**

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We are 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, we would consider presenting a joint case with them at the hearing.**

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Steve Morison 5-3-17 Steve Morison  
Signature date

Toni Morison 5-3-17 Toni Morison  
Signature date

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**Introduction**

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

**I am writing to you as farmer in the Arohena district. Our farm straddles both the Waipa and Upper Waikato FMUs. Our farm is a family operated business having a mix of livestock policies including sheep, beef-cattle, deer, maize and some forestry. We have always been mindful of our responsibility as land custodians and exercise what we believe is good stewardship. Our farm management system operates in a manner that follows a keep it simple pragmatic approach ensuring we operate in a sustainable and efficient manner and this has allowed good productivity to be achieved. Our mix of livestock policies and stocking rate matches the capability of the land. The grazing management varies as needed throughout the year in tune with the seasonal pasture growth curve. Pasture production is supported by regular use of fertiliser as recommended by the fertiliser field representative maintaining nutrient levels in the optimal range. In summary, we believe our farm is managed sustainably applying good pragmatic stewardship matching land use with its natural capability. It is our intent that we will continue with this approach because it has rewarded us well and maintains the land in good health.**

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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The specific provisions my submission relates to are:	Our submission is that:		The decision I would like the Waikato Regional Council to make is:
Stock Exclusion	Support with modifications	<p>Every farm is unique as no two farms are the same. If stock exclusion is not managed correctly the cost will cripple farm businesses, the negative impact will ripple through rural towns, school roles, rural service industries, council viability, etc.</p> <p>We believe that stock exclusion on flat land <math>\leq 15</math>-degrees is doable and cost effective for purpose. However, in hill country where contaminant loss risk is low the cost benefit is dubious and more so if reticulated water systems must be installed in lieu of natural water.</p> <p>What is intolerable is that in some sub catchments the application of stock exclusion as a mitigation may not be enough to limit contaminant loss and that afforestation may be the only effective mitigation to apply. This has not been communicated to farmers which is irresponsible. Farmers will spend good money putting up fences, installing water reticulation to no avail. It may cause farmers financial ruin. This lack of certainty is cruel, creating distrust and anxiety.</p>	<p>Relief sought</p> <p>In hill country stock exclusion, should only apply following an assessment using the Farm Environment Plan identifying critical source areas and high management risk. This will equate where the stocking rate of cattle and / or deer is high <math>\geq 1000</math> kgLW/ha</p>

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<p><i>Nitrogen Reference Point (NRP)</i></p>	<p>Support in part and Amend in other parts</p>	<p>We understand the need to know what the contaminant loss rate arises from every farm to understand the load to water. We therefore support the NRP being used for this purpose.</p> <p>We do not support the NRP used in a manner to cap (Grandparent) land use where nitrogen loss rates are low. This penalises those with low loss rates where the impact upon water quality is negligible. Our farm system relies upon flexibility to change livestock policies reflecting climate and market change. This change will incur an adjustment in nitrogen loss but by and large it is not significant in comparison to other land use where N loss rates are significantly higher.</p> <p>We do not believe a rolling N loss average will provide the flexibility we demand. The flexibility we seek is not land use change as such but simply adjustments of our normal livestock policies typical of sheep and beef-cattle farm systems</p> <p>We support where land use incurs very high N loss that this loss be reduced to the dairy 75<sup>th</sup> N loss percentile per FMU</p>	<p>The relief we seek is that i) land users who have low N loss rates i.e. <math>\leq 20</math> kgN/ha should not be grandparented; and ii) all pastoral land users with low N loss farm systems should have an equal allocation of 20 kgN/ha to provide them the needed flexibility to operate a viable and sustainable farm business</p>

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Farm Environment Plans (FEP)	Support in part	<p>We believe well prepared Farm Environment Plans that are tailored for the individual needs of each property and land use are a valued tool deserving of our support.</p> <p>We question whether there will be enough well qualified people with adequate experience to become Certified Farm Environment Planners particularly those who will engage with the sheep, beef-cattle and deer sector and where soil conservation will be a big component of an FEP</p>	<p>Relief sought</p> <p>Farmers cannot be penalised if there is not enough capability and competency to provide the required expertise preparing FEPs</p> <p>Time extensions need to be granted in advance when it becomes known that it will be impossible to meet specified FEP submission deadlines</p>
Hauraki Exclusion	We Oppose	All land users in the PC1 region be treated equally.	<p>Relief sought</p> <p>Place the plans process on hold until the catchment is reinstated as was originally.</p>
Sub Catchment scale planning.	We support this approach	<p>Every farmer will know what must be done to control / mitigate their own contaminate loss, take ownership and be responsible for. We believe that land use must be sustainably managed adopting good stewardship.</p> <p>WRC must have good evidential science with peer reviewed findings. The Overseer tool must be developed further to withstand scrutiny and question.</p>	The WRC's ability to accurately measure contaminate loss and ascertain source needs to be beyond reproach, must be science based.

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Yours sincerely

STEPHEN MERRISON

S S Merrison 5/3/17  
Signature Date