

**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: *Stokes Shorthorn Farm Ltd*

Phone (Hm): *07 8246751*

Phone (Wk): *027 2909040 or 027 4844672*

Postal Address: *RD1 Taupiri*

Phone (Cell): *027 2909040 or 027 4844672*

Postcode: *3791*

Email: *kelv_ssf@xtra.co.nz*

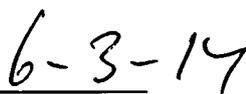
I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

I wish to be heard in support of this submission.

Kelvin Stokes - Director



Signature



date

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

Please consider forwarding a copy of your submission to B+LNZ so we can echo your comments in our submission

The land owned by the company Stokes Shorthorn Farm Limited has been in the family for 50 years and is farmed in conjunction with the directors other small properties.

Because of the size of this farm the small ones each director owns there is certain amount of work done off the farm to assist in paying debt and to help in the maintenance. We have never subscribed to overstocking, and spend a great deal of time on stock management so that we do not have cattle in waterways.

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 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.

<p>The specific provisions my submission relates to are:</p> <p>State specifically what Objective, Policy, Rule, map, glossary, or issue you are referring to.</p>	<p>My submission is that:</p> <p>State:</p> <ul style="list-style-type: none"> • whether you support, or oppose each provision listed in column 1; • brief reasons for your views. 	<p>The decision I would like the Waikato Regional Council to make is:</p> <p>Give:</p> <ul style="list-style-type: none"> • precise 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
<p>Provision</p> <p><i>Stock Exclusion</i></p> <p><i>Schedule C</i></p> <p><i>Rule 3.11.5.1</i></p> <p><i>Rule 3.11.5.2</i></p>	<p>I support/ oppose/ and for each whether or not you wish to amend</p> <p>The reasons for this are:</p> <p><i>The exclusion of stock from all waterways is at best an aspirational plan. For the area between 15 degrees and 25 degrees stock management would be much more appropriate. Likewise the size of the drain to be fenced could be better defined by size e.g. (1metre wide x 30cm deep). A drain 300mm wide with a 1 metre exclusion each side sounds like overkill.</i></p> <p><i>The current document does not have reasonable implementation plan and therefore impracticable. Why should the land owner bear all the cost of this change - with the running water ways bare all the costs.</i></p>	<p>I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below</p> <p>As an alternative I propose</p> <p><i>Stock to be excluded from all drains/ streams/rivers greater than one metre wide that run continually with a fence 500mm from the edge of the bank</i></p> <p><i>Extend the timelines and give certainty to those of us with land classed as at risk of erosion that we are not wasting our money and resources in fencing it due the possibility it may be changed in future plans.</i></p> <p><i>The Waikato Regional Council should provide a fencing subsidy at very least, and compensation where exclusion impacts on the farms income.</i></p>

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

Provision	I support/ oppose/ and for each whether or not you wish to amend	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below
<p><i>Objectives 1 and 3</i></p> <p><i>Policy 5 and 7</i></p> <p><i>rules 3.11.5.3- 3.11.5.5</i></p>	<p>The reasons for this are:</p> <p><i>This document gives no certainty to the farmer in the long term no matter what type of farming he is engaged in.</i></p> <p><i>Only first ten years of an 80 year programme is covered and the upfront cost for all farmers occurs in the first ten years and with no certainty that this will either achieve the aspirations of the regional council or actually enable farmers meeting the requirements in full will have a viable property to continue farming beyond the ten years.</i></p> <p><i>With only inclusion of some land in the catchment area defined there is no level playing field and left in particularly priority one area will bear the impact for this hastily implemented Plan Change</i></p>	<p>As an alternative I propose</p> <p><i>A detailed model clearly set out covering the time frame between 0 and 80 years.</i></p> <p><i>The model to give expected outcomes as a result of the implementations made by the regional council.</i></p>

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

Provision	I support/ oppose/ and for each whether or not you wish to amend	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below
<p><i>Nitrogen Reference Point</i></p> <p><i>Objectives 1 & 4</i></p> <p><i>Policy 2 & 7</i></p> <p><i>Rules 3.11.5.3 - 3.11.5.7</i></p> <p><i>Schedule 1</i></p>	<p>The reasons for this are:</p> <p><i>The nitrogen reference point calculation is at best suspect.</i></p> <p><i>If you want these reference points all calculated by professionals then we need to know who is available to do them.</i></p> <p><i>What is the cost to calculate the reference point - another expense</i></p> <p><i>The system of effectively back dating the calculation of this point when farmers are in a new calendar year is totally unfair.</i></p> <p><i>Farms in development or redevelopment stage are unfairly treated.</i></p> <p><i>e.g. younger person taking over from a grandparent who had reduced certain activities on the farm so they could cope.</i></p> <p><i>This does not reward the good custodians of the land and has only looked after those that pollute and continue to do so.</i></p> <p><i>There is no level playing field between the dairy farmers and the non-dairy farmers.</i></p>	<p>As an alternative I propose</p> <p><i>The nitrogen reference point is set aside and a system where effects based is utilised.</i></p> <p><i>Actual farm problems should be addressed, a blanket approach will do nothing.</i></p>

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

Provision	I support/ oppose and for each whether or not you wish to amend	I seek that the provision is: Deleted in its entirety/ Retained as proposed amended as set out below
<p><i>Farm Enviroment Plan</i></p> <p><i>Policy 2</i></p> <p><i>Rules 3.11.5.3 - 3.11.5.7</i></p> <p><i>Schedule 1</i></p>	<p>The reasons for this are:</p> <p><i>The cost of having to employing someone with certain qualifications to do the initial plans.</i></p> <p><i>The subsequent cost of updating these plans.</i></p> <p><i>The time frame for Priority 1 persons is unreasonable.</i></p> <p><i>A system whereby farmers are deemed unable to write their own gives them no confidence in that this is workable plan.</i></p> <p><i>This section of the plan change 1 deems to create a new industry at the expense of the farmer.</i></p> <p><i>It is completely impractical.</i></p>	<p>As an alternative I propose</p> <p><i>A farm enviroment plan is supported if farmers are able to prepare these plans themselves under certain guidelines.</i></p> <p><i>The plans must be able to have the flexibility of being easily able to meet the changing rules that regional council is likely to introduce in future years.</i></p>

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

<p>Provision</p> <p><i>Land Use Change</i></p> <p><i>Policy 6</i></p> <p><i>Rule 3.11.5.7</i></p>	<p>I support/ oppose/ and for each whether or not you wish to amend</p> <p>The reasons for this are:</p> <p><i>This rule allows no flexibility in the first 10 years.</i></p> <p><i>Whilst there is a provision for Resource Consent this likely to be difficult to obtain.</i></p> <p><i>There are lost opportunity costs for all types of farmers. e.g. The dairy farmer will not be able to take over grazing land adjacent to their own even if it was previously being used as part or as a whole dairy farming and even if it has continued to graze dairy heifers. e.g. The beef farmer cannot sell his land at the end of their farming life for a fair value when others may seek it for their type of farming.</i></p> <p><i>Plan appears to assume that all dairying is on flat land and all pastoral farming on hills and takes no account of land use history.</i></p> <p><i>Provisions made for flexibility to allow Maori owned land to be developed gives them an advantage over all other land owners. Why should this be the case?</i></p> <p><i>Because only those persons in Priority one to three areas are affected in the first ten years others outside the area will have advantages.</i></p>	<p>I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below</p> <p>As an alternative I propose</p> <p><i>Any draconian rule of this nature needs a gradual introduction and it should not be a rule that only selected people are affected by. Rules should affect all farmers not just those in priority one to three.</i></p>
--	--	---

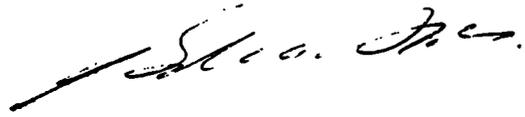
WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

Provision	I support/ oppose/ and for each whether or not you wish to amend _____	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below _____
<p><i>Policy 16</i></p>	<p>The reasons for this are:</p> <p><i>We oppose this policy. The ownership of the land should not have any bearing on whether or not the rules apply or not. The issues addressed in this plan are contaminant discharges and the rules should be the same of all regardless of ownership.</i></p>	<p>As an alternative I propose</p> <p><i>We seek that this policy is removed.</i></p>

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

Yours sincerely

Kelvin Stokes and Barbara Stokes



6-3-17

5 March 2017

Signature

Date