

Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

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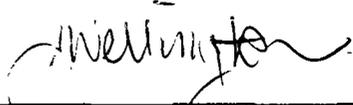
PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION
Yes I wish to speak at the hearing in support of my submissions.
I do not wish to speak at the hearing in support of my submissions.

SIGNATURE OF SUBMITTER

(or person authorised to sign on behalf of submitter)

A signature is not required if you make your submission by electronic means

Signature



Personal information is used for the administration of the submission process and will be made public. All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal information.

I could not gain an advantage in trade competition through this submission.

Wellington Farms Limited operate a 600 ha intensive dry stock farm running: 3650 deer, 640 dairy grazers, and 600 ewes. We are in the River FMU, priority 2.

The stags are set stocked in February until July and are rotationally grazed for the rest of the year with supplements when required. The hinds are set stocked at mating and during fawning. They are rotationally grazed for the rest of the year with supplements when required. The dairy grazers are rotationally grazed all year round and supplemented during summer, autumn and winter. The ewes are rotated around the laneways and are set stocked during lambing.

Wellington Farms have constructing fences around waterways for the past 30 years, which cost approximately \$390,000 and planted trees in these riparian strips, costing in the vicinity of \$70,000. We have made a prediction of what we believe will need to be fenced off for PC1 and it is in excess of \$1,600,000 depending on how the Farm Environment Plan requirements are interpreted. The bulk of the costs are tied up in hill country fencing and water reticulation.

Wellington Farms continue to fence off waterways when time and money permits. This has led to Wellington Farms winning or received placings for the following environmental awards;

- 2012 Premier Winner The Elworthy Environmental Award, The New Zealand Deer Industry Biennial Environmental Awards
- 2012 for Excellence in Riparian Management, The New Zealand Deer Industry Biennial Environmental Awards
- Balance Farm Environment Awards 2012, Beef + Lamb New Zealand Livestock Farm Award
- Balance Farm Environment Awards 2012, Massey University Discovery Award
- 2004 Duncan and Co. Environment award, The New Zealand Deer Industry Biennial Environmental Awards

- 2003 Farm Environment Award Trust, Merit award

In the future, we plan to continue to fence off more waterways, increase our profitability and sustainability. The farm has succession planning in place and we will consider buying neighbouring property's if they come up for sale.

We are concerned about the following issues with PC1: costs to the business, the practicality of fencing off ALL the waterways and then re fencing farm paddocks. The loss of income, loss of employment for staff, and loss to the community and small country school. Also loss for future generations on the farm.

We am particularly concerned about the following aspects of Plan Change 1:

- The significant negative effect on rural communities and schools.
- The cost to comply and the practicality of the rules.
- The loss of income to our business.
- The cost for future generations.
- The effect that the Nitrogen Reference Point will have on my business and my economic wellbeing.
- The Farm Environment plan requirements leading to unnecessary and costly regulation of inputs, outputs, normal farming activity and business information
- The costs and practicality of the rules and requirements for stock exclusion, the Nitrogen Reference Point and the Farm Environment Plan.
- The timeframes for complying with the Nitrogen Reference Point rules which are too short and unachievable
- The restrictive time frames and the ability to achieve them.
- The lack of information of what is planned after PC1
- The lack of science and monitoring at the sub catchments level
- The lack of clarification of some rulings of PC1
- No consultation of the completed plan, no guarantee on the future
- No social or economic impact report

We wish to be heard at the Hearing.

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 outcome sought and the wording used is 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.

Rule number:	Title:	Oppose or support:	Reason	The decision we would like Waikato Regional Council to make is:
Objective 1 and TABLE 3.11-1		SUPPORT with amendments	We support the long term restoration and protection of our waters. We are concerned that the table 3.11-1 may not be able to be achievable and not even achievable if every farmer complies to the proposed PC1. The lack of information of what is planned after PC1	- Retain the intent of objective 1, but amend the Table 3.11-1 so that the water quality targets are achievable - Make available the plan beyond PC1.
3.11.5.1 3.11.5.2	Stocking rate cannot increase.	OPPOSE	- This rule doesn't allow for technological advances (fertiliser application, pasture management tools). - Inhibits the ability to change farm type eg. sheep and beef to dairy. - If land is purchased we are restricted to what the previous land owner's stocking rate was.	- Relate the stocking rate to the soil type, land contour and farm environmental plan. - Remove the clauses that hold land use to historic stocking rates.
3.11.5.2	Discharge of nitrogen, phosphorous, sediment, pathogens cannot increase	SUPPORT with amendments	- Leaching into the waterways is undesirable for the ecology and wildlife.	- Relate this rule to the soil type and land contour. - Use a catchment based approach, not a blanket rule for all farms.
3.11.5.2	Nitrogen leaching, granparented to the highest annual loss rate calculated for either 2014/15 or 2015/16 and must be no greater than 15kgs/ha/year	OPPOSE	- No room for farm improvement. - The 2014/15 and 2015/16 years were abnormal years for nitrogen leaching for us as we were in a drought and as such we can't utilise our feed in a good season. - Can't make the most of the good years, can't make up money in the rainy summers for years there are droughts. - If someone purchases land, you are restricted to what the previous nitrogen reference point was. - If you are looking at selling land the nitrogen reference point will affect the price of the land.	- We request that the Nitrogen Reference Point and the use of Overseer are removed from the plan completely. - Relate it to the capability of the land and the farm environment plan. - Use science to determine what would work best on each farm.
3.11.5.2	Stock excluded from all permanent	OPPOSE	- Who decides what a permanently flowing waterway is? How will they police it? - There are some paddocks where stock need to get to	- Any waterway fencing, riparian panting and water reticulation needs to be subsidised by the regional council.

	flowing water body's, wetlands and lakes by 1 st July 2023 or 2026 depending on catchment		water bodies for drinking water. - Fencing costs (digging posts into rocks) in the short time frame. - Loss of productive land. - Weed control and planting costs in fenced off areas.	- A minimum standard of fencing to be upheld. - A permanent flowing waterway needs to be clearly defined. - Use the national water policy statement. - No fencing over 15° - We need a 30 year timeframe.
3.11.5.2	3 metre set back distance for new fences	OPPOSE	- Where does the 3 metre setback rule start from, the middle of the waterway or the verge? - Loss in productive land. - Planting the verges of the waterways will encourage bird life to inhabit this area causing pollution to the waterways	- Reduce the 3 metre set back to 1 metre.
3.11.5.2	No cultivation on land greater than 15° slope	OPPOSE	- 15° slope is not a steep gradient, this rule favours flat farms. - No improvement of pasture (hard to get rid of bugs and weeds in the soil). - Lack of food in winter (crops). - Can't improve soil structure (removing iron pans).	- Remove the rule completely OR Change the gradient to 60°
3.11.5.2	Cultivation must not occur within 5 metres of waterbodies	OPPOSE	- Loss of productive land. - Encouragement of weeds to grow.	- Cultivation should be allowed up to fence lines.
3.11.5.2	No grazing land on slopes greater than 15°	OPPOSE	- How is the 15° determined, will it be an average over the whole paddock? Will it be all slopes over 15°? We will lose 85% of the farm land. - Can't sustain any staff on the farm. Loss to the community and local country school, and future generations.	- Remove this rule completely.
	Removal of Hauraki portion of the plan	OPPOSE	- All farms are not being treated equally. - We cannot determine if the plan is working if some areas are not involved	- Remove the plan entirely OR put the PC1 plan on hold until the north-eastern (Hauraki) portion of the plan is reinstated.
3.11.5.7 and any relevant points within this plan	Restricting land use change	OPPOSE	- It affects the value of our land and impairs any future ability to develop and grow our business.	- Delete it entirely. - Relate it to the capability of the land and the farm environment plan.

3.11.4.5	Sub catchment scale planning	SUPPORT, we support this implementation method	- This is a good approach to controlling contaminant discharge and gives each farm and catchment ownership over their future.	- We want the plan to be based on scientific evidence as to what is causing the decline of water quality.
3.11.5.1 3.11.5.2 3.11.5.3 3.11.5.4 3.11.5.5 3.11.5.6 3.11.5.7	Farm environment plans	SUPPORT with amendments	- We support the idea of using a farm environment plans to set guidelines that target the improvement of environmental issues of the land and waterways.	- These need to be guidelines NOT rules. -Farms can produce their own farm environment plan with guidance from a council. - Timeframes should be deleted and instead set through consultation with the farmer taking into account their financial constraints.
3.11.5.2	Provision of information to Regional Council required	OPPOSE	- No privacy of information - Does it contradict the Privacy Act?	- Farmers should not be forced to provide information to their local Regional Council.
Policy 16	Policy 16	OPPOSE	- The ownership of land should have no bearing on whether the rules of PC1 apply or not, the rules should be the same for all regardless of ownership.	- We seek that Policy 16 is removed.

We believe that the Waikato Regional Plan Change 1 should be incorporating cities, towns and businesses that operate in the catchment concerned with PC1. As farmers are not the only businesses contributing to the pollution of the waterways.

Cannot retire land without the ability to recoup these costs and losses of production thus resulting in increasing productive areas meaning nitrogen would increase. Under the proposed plan this is not viable.

The plan should clearly set out how it intends to achieve the 80 year outcomes so to provide certainty for people and communities.