#### 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.

Signature / 13/17

## Introduction

We have two farms nearly 500 hectares at Waipuna Road of which about 15 hectares is in the headwater of the Waitomo stream. Most of our farm is the headwater of the Tawarau river, a West Coast catchment. Our second farm is 48 hectares on Tikitiki Road, Piopio, again a West Coast catchment.

Two generations of our family have farmed Waipuna Road since 1965 turning the farm from one which ran 400 ewes badly into one that carries 4,200 stock units in a 60/40 sheep/cattle ratio. We are a breeding finishing operation utilizing the two blocks. We do not undertake any cropping. We use non-acidic reactive rock slow release fertilizer on our pasture.

I would describe the Waipuna Road property as being easy ridge tops with steeper gullies. The bottom third of these gullies is papa filled. We have a comprehensive water system with at least two troughs in every paddock.

The papa rock in the bottom third of the gullies is swampy leading down to a papa river bank which varies from 300 mm to 2 metres in height. The stock have very limited access into the waterways, although they are able to enter the swamp areas for grazing purposes. They access their drinking water from reticulated troughs.

Over the years we have fenced off native bush totaling approximately 10% of our farm.



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 decision Twould like the Waikste Decises

The specific provisions my submission relates to are:  State specifically what Objective, Policy, Rule, map, glossary, or issue you are referring to.	My submission is that:	The decision I would like the Waikato Regional Council to make is:
	<ul> <li>whether you support, or oppose each provision listed in column 1;</li> <li>brief reasons for your views.</li> </ul>	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
Provisions  Nitrogen Reference Point	I oppose the requirement to be held to a Nitrogen Reference Point.	I would like the Council to withdraw the Nitrogen Grand Parenting rule.
Objectives 1 and 4 Policies 2 and 7	The reasons for this are:	
Rules 3.11.5.2 to 3.11.5.7 Schedule B	I do not like the idea that someone can have a limit of 60 when mine might be around 15.	
	My land would never cope with nitrogen leaching of 60 however I do not want to lose the flexibility to increase cattle numbers in the years where sheep and wool returns are low.	
	We have always farmed within the biophysical characteristics of the property and now you are proposing to penalise us for having been good custodians.	
	Conversely the highest Nitrogen emitters are allowed to carry on - has it been a race to be the highest Nitrogen leacher?	

Nitrogen Reference Point Objectives 1 and 4 Policies 2 and 7	Why should the highest emitters be allowed to carry on while the lower emitters have their farming systems and flexibility limited?	•
Rules 3.11.5.2 to 3.11.5.7	monator mineral	
Schedule B (Continued)	My understanding is that the Waipa River doesn't have a nitrogen problem. I wouldn't like to think that somebody else in a different catchment is going to have the ability to use our nitrogen savings under a trading scheme. That is a robbing Peter to pay Paul scenario.	
	Do the implications of grandparenting survive a cost/ benefit analysis. Ie are the modifications I would be required to make going to make any diffence at all to water quality.	
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Stock Exclusion
Policy 2
Rules 3.11.5.2 to 3.11.5.7
Schedule C

I support stock exclusion in principle. I wouldn't mind seeing pigs excluded from my property let alone the waterways.

However other mitigations need to be recognized.

I consider stock exclusion, fencing waterways, especially where said fence would need to be many tens of metres away from a small creek for the fence to be "sustainable", a <u>land grab</u>.

If this sledge hammer approach was taken then provisions for recompense would need to be included in the plan to purchase the fenced out land and full property ownership obligations be undertaken by WRC.

Property ownership obligations include:

- \* A half share in fence erection and maintenance; and
- \* Total control of evasive weeds within the land grabbed.

You are asking me to make considerable investment in mitigation – what evidence have you got to show that my farm is actually causing a problem? We need to see individual farm specific evidence of cause and effect.

Is the economic cost of fencing my class of hill country realistic to the environmental benefit?

I seekthatthe provisions are amended to recognize other mitigations other than the sledge hammer approach of fencing waterways with the spin off of sediment contamination through the bulldozing of fencelines.

Other mitigations include water systems, ie alternative stock water sources. Stock crossings as opposed to stock wading. Recognition of unfenced native bush bordering waterways.

I would support the proposal that the national stock exclusion standards be used in PC1.



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Т	he Plan as a Whole	I support the principle of the plan to improve river health but I feel that more effort should be made to find out where the problems are occurring (be they town vs country, intensive easy country vs more extensive hill country) and those findings be published and made available to everyone.  As I understand it Overseer has a considerable margin of error, I would like to be given the same level of tolerance.  As a headwater property – if you can prove to me that I am a problem then I acknowledge that I will need to own the problem and undertake steps for improvement.	I would like to see different land classes and different farming intensification levels recognized throughout the plan.



Yours sincerely

Adrian Verry

Signature

Date