

**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
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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 do not wish to speak to my submission at a hearing.

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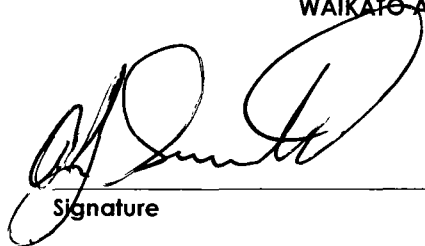
Introduction

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

I am a sheep and beef farmer in the Kawhia Harbour/Taharua Lake catchments. My family and I have been farming this area since early 1900's and I have been farming here since 1979. The property ranges from 100 to 1000 ha and we have a retention scheme that serves all of the property. Some of the property (recently purchased) is being used for red deer and will include cropping. Stock classes often change depending on market prices such as market demands. My operations are not intensive and farming practices are varied to suit weather conditions, concentration of damage to land and waterways. There is some forestry on the property that is ready for harvest and we know deer planting and exclusion of some stock from sensitive areas such as gorges and riparian areas to address them during the development of a Farm Management Plan.

While I am a ratepayer in the Waikato/Waipara catchments, I am a Waikato Regional Council ratepayer and am a resident of that catchment. This is said not to be a fair price for the West Coast catchments, many of the aspirations and plan changes that have been established precedents. They will not have enormous success and with implementation by WRC, the proposed Plan Change 1 will affect my business and the future of my services to the Waikato/Waipara catchments.

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A handwritten signature in black ink, appearing to be 'A. Smith', written over a horizontal line.

7.3.2017.

Signature

date

Signature

date

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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 specific provisions my submission relates to are: | My submission is that: | | The decision I would like the Waikato Regional Council to make is: |
|---|-------------------------------|--|---|
| | SUPPORT / OPPOSE | SUBMISSION | DECISION SOUGHT |
| <p>3.11.2 Objective 1 Table 3.11-1</p> | <p>Support with amendment</p> | <p>I support the long-term protection of our waters but not at levels that compromise the social and economic values of people and communities. Water quality targets should take into account any implications for resource users and ongoing management changes. NZ is a very different place from 150 years ago and some compromises have to be made to achieve realistic expectations.</p> | <p>Ensure targets are achievable ie do not apply during flood events.</p> |

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| Permitted Activity Rules 3.11.5.1 & 3.11.5.2 | Oppose | Proposed rules do not provide for low intensity and low risk land uses and do not provide flexibility for these land uses. | Apply national stock exclusion requirements on flat and rolling land but not hill country. Enable flexibility in land use, discharges and stocking rates up to these standards. |
| <i>Nitrogen management.</i> <i>All references to this.</i> | Oppose | I believe Overseer was never meant to be used in the proposed way and there are challenges with consistency of results. I oppose the approach of holding users to their Nitrogen Reference Point. It penalises low emitters who may be able to develop their farms but not then stock them in order to help pay costs of mitigating against other contaminants. | Adopt a sub-catchment approach to addressing contaminants that are relevant to each farm – not a blanket restriction of one nutrient that may not even be relevant to the waterways in that sub-catchment. Eg hill country. |

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| 3.11.4.5 . Sub-catchment scale planning | Support with amendments | I believe this is a sensible approach to achieve the objectives of PC1 and it potentially reduces the emphasis in individual properties but allows for solutions to be arrived at in a collaborative way within a community. There would be a greater sense of ownership and control over their future. The individual Farm environment plans would follow and then give effect to the sub-catchment plan. | Make development of sub-catchment plans a priority for implementation. |
| Schedule 3 Stock Exclusion | Oppose | The stock exclusion rule is too onerous and does not consider the widely varying situations on farms in the catchments. The benefit versus cost for fencing on high intensity farms is potential high but is potentially very low for low intensity hill country farms. | <p>Replace it with the proposed national stock exclusion regulations (Ministry of Environment 2/17)</p> <p>We would like to see a provision that allows for cattle crossing a waterbody without requiring a formed stock crossing structure when crossings are less than 3x weekly.</p> |

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| <i>Equity and Implementation.</i> | | I am concerned that while the benefits of improvements in water quality are for the whole region, the costs are spread very unevenly. Even within the rural sector the costs are spread unevenly with some of the highest costs to be borne by hill country farmers. The impact of these costs on rural communities has not been assessed. | Develop a plan that spreads the costs more widely across the region rather than a strictly user pays approach. Particularly for the sub-catchment plans and that these are focused on the areas where the benefits are greatest. |