Submission Form

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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

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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.

If others make similar submissions, I would consider presenting a joint case with them at the hearing.

2017 8 Signature date

Signature

date

Introduction

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

My name is Campbell Clarke, age 57. I have been farming since I was 15. I have farmed sheep, goats, bull beef, breeding cows, dairy cows and deer. I am a Trustee of a Family Trust who farm on Tauraroa Valley Road, Pawwhenua, Otorohanga in the Waipa River Catchment. The main farm was purchased in 1980 by my family and added to by purchasing part of a neighbours farm in 2002 and have since purchased an additional 188ha Deer/Drystock farm in 2015 two km from the home farm.

The Trust farms 538 ha farming dairy cows, deer, replacement dairy heifers, beef cattle from birth through until sale or slaughter, dairy herd bull sires which are farmed for 2 years all on land that is river flats to steep country in the Upper Waipa in the King Country. The Deer are farmed on flat to steep country with dairy animals, milking cows and replacements grazed in the deer farm at times of surplus grass. All waterways on the dairy farm are fenced but blackberry establishes and grows quickly in the fenced off area.

On the 144 ha deer/drystock farm, hinds plus beef animals are farmed with dairy replacements and dry cows grazing at times of surplus grass and winter grazing.

The 144 ha deer farm block prior to purchase only had fertiliser applied once in the 15 years over the whole farm. It was 40% covered in gorse when we purchased the farm.

A cropping programme is carried out on both farms.

We live in a high rainfall area with steep gradient and expect a cloud burst at least once/twice a year. This causes loss of fences, silting of pasture, movement of the Tauraroa Stream riverbed.

A gravity water supply on the home farm is collected from QEII Bush 800m from our boundary and is high in E Coli. This bush boundaries the Pureora Forest so no farmed animals have access to this waterway.

I started farming because I was passionate about the farming industry, loved the lifestyle and could make a reasonable

income. I get a lot of satisfaction from improving under developed farmland into reaching its full potential which is why we recently bought a 144 ha under achieving farm and are in the process of increasing production by using fertiliser and cultivation.

My dream is to see the land continued to be farmed by my family and generations to come in a manner that is achievable, giving a financial return and rules/regulations that are realistic.

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	REASON	RELIEF SOUGHT
Provision	I support/ oppose/ If you support you can support but require amendments	The reasons for this are:	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below As an alternative I propose
Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchment	Oppose	Deer have been included in the plan when they are browsers and don't defecate in waterways. Deer should be treated the same as sheep.	Delete all reference to 'Deer' in its entirely
3.11	Oppose	Plan is written to be implemented for pastoral farm land and horticulture only. No urban emitters are included in the plan.	Withdraw plan

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3.11.1 Values and uses for Waikato and Waipa Rivers	Oppose	Collaborative Stakeholder Group had one person representing 43% of the Land Area. Deer farmers didn't have a representative.	Withdraw plan
3.11.2 Objective 2	Oppose	No evidence has been made available about Social, economic, and cultural wellbeing is maintained in the long term. Financial implications of the plan will affect the social and economics of the farming community.	Withdraw plan
3.11.2 Objective 4	Support with amendments	An 80 year plan must have time to implement with costs being sustainable to allow the people and community to be resilient.	Extend the plan to 35 years for first stage
3.11.4.3 Farm Environment Plans	Support with amendments	A Farm Environment Plan should be able to be written by farmers as not enough Certified Farm Environment Planners are qualified and the cost to the farmers of the planners. The plan has to be workable, flexible, and able to allow for variables with seasonal conditions. The Plan should not penalize farmers that interchange different classes of drystock. An Environmental Plan to be valid for 20 years.	Allow farmers to write the Farm Environment Plan from a template provided by Waikato Regional Council or use a Certified Farm Environment Planner. An Environmental Plan to be valid for 20 years.
3.11.4.5 Sub-catchment scale planning	Support with amendments	This should be used to identify areas that have major issues and get farmers to buy in to correct the problem isolated to the area. Science should be used as a tool to identify areas of concern.	Delete F & G Use science to identify areas of concern in a sub-catchment

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3.11.5.2 Permitted Activity Rule – Other farming activities	Support with amendments	Not achievable	Delete 4 c & d Delete 4 e ii Amend 4 3 I to read – There shall be no cultivation within 3 meters of the bed of the water body
Schedule B Nitrogen Reference Point	Oppose	Grandparenting – It penalizes the low emitters and the polluters can continue to pollute. There is no scientific evidence that nitrogen restriction will be of any benefit. One rule does not fit all. Overseer is not suitable as a regulatory tool and results are too variable. It was not designed to be used for this purpose and is a tool for farmers. Need to use Science to support the decisions.	Withdraw plan Withdraw plan

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Schedule C – Stock exclusion	Support with amendments	Animals are currently allowed to be moved across waterways 3 weekly in a controlled shift. The stock exclusion requirements to be consistent with the Government Clean Water Report and fenced up to 15 degrees only. Requirements have to be achievable and meet health and safety regulations.	In accordance with the Government Clean Water Report and fenced up to 15 degrees only. Delete 3 5 I Amend to Any river that continually contains flowing water over 1 m in width and 30 cm in depth. 5 ii Amend to Any drain that continually contains flowing water over 1 m in width and 30 cm in depth.
Schedule 1 - Requirement for Farm Environment Plans	Support with amendment	Farm Environment Plans should be able to be written by Farmers	Allow Farmers to write Farm Environment Plans Delete 2 (b) (ii) & (iii)

Summary

No consultation by Waikato Regional Council has been undertaken on the completed Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments before the plan was notified.

No social or economic impact report has been undertaken or provided to guarantee the long term wellbeing of the community.

This is an 80 year plan, but they are implementing it within a 10 year time frame which is costly and gives an uncertainty to the land owners. It should be a 35 year plan.

The Drystock farmers had one representative on the CSG covering 43% of land area.

Deer Farmers were not consulted and didn't have a representative on the CSG.

Grandparpenting for Nitrogen Reference Point is not acceptable.

Overseer is not fit for purpose. Constant Overseer updates mean that nutrient levels keep changing and are hard to maintain.

Science has to be used to support decisions and someone that understand the science.

Nutrients need to be adjustable and how they are distributed between Dairy, Drystock and Horticulture

Waterways to be fenced in accordance with Government Clean Water Report over 1m running water and 30cm depth fenced 1m from waterway. Fencing over 15 degrees not required.

Farm Environment Plan have to be workable, achievable, flexible and valid for 20 years.

Cost to land owners has to be affordable.

Forestry is not the answer to steep land. Quite often it is uneconomical to harvest and costs over the 28 years unaffordable to small land owners. Water from forestry is tainted in taste and discoloured.

Sediment is not fully controllable in our area due to high rainfall and steep gradient.

Urban emitters have not been included in the plan.

The PC1 should be withdrawn until the withdrawn part catches up.

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Yours sincerely

Campbell Clarke

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