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

Our property is located in the upper catchment of the Opuatia stream, and has been in the same farming family for 3 generations. We are already in the process of fencing off some of our larger waterways where practical (WRC watershed project). We also plant approx. 50 - 100 poplar and willow poles per annum to mitigate against land moving. We are all agree that the Waikato river water quality needs to be improved and are regular uses of the river at the Tuakau bridge for boating and water sports and have noticed how dirty the river can be at times. For water quality to improve, all of the communities living within the Waikato catchment need to do their part, not only Agriculture. To achieve the 80 year aspirational goal to make the Waikato swimmable and safe to collect food, this is going to cost. This cost needs to be shared by everyone within the Waikato catchment, no exceptions. Another major contributor to sediment in the Waikato catchment is the koi Karp. There is nothing in the proposed plan that I can find that states that these need to be dealt

with. What does the WRC propose to do? If we as landowners are going to contribute to achieving this 80 year goal, then the WRC need to step up and take responsibility.

We wish to be heard in support of this submission. If others from the Onewhero / Wairamarama area make a similar submission, we would consider presenting a joint case with them at the hearing.

Signed	Date 8 th March 2017
Signed	Date

The specific provisions our submission relates to are:	Our submission is that:	The decision we would like the Waikato Regional Council to make is:		
Schedule C :Stock Exclusion	We oppose the rules and timelines set by Schedule C.	We would like the rules and timelines set by Schedule C amended as follows:		
	The reasons we think this are: We farm a 290 ha extensive sheep and beef property, which contains 3 named water ways and many small tributaries and swamps. The property is located at the head waters of the opuatia stream and is surrounded by forestry on the northern side. The exclusion of stock from all defined water bodies is extreme, and not practical or financially viable on our farm. The council has not provided enough scientific evidence to prove that excluding stock from all defined water bodies in the upper catchments of the Waikato river improve the water quality further downstream. We need to be guaranteed by the WRC that the investment in fencing and water reticulation is going to make a difference to water quality downstream.	Cattle, horses, deer and pigs should be excluded from water bodies with a continual flow of surface water wider than 1.5m average, rather than <i>all</i> of the defined water bodies. All landowners on the Waikato catchment should be required to comply with the proposed plan change 1 schedule C. no exemptions. The timeline for change needs to be realistic and should be covered in the property's Farm Environment Plan. The timeframe of having all waterbodies fenced off by 1 July 2026 should not be set until the Plan has been finalised. The amount of fencing required on different hill country properties will vary greatly. The properties with large amounts of fencing to do should be given a different timeframe to complete than those properties with a small amount of fencing.		
	The neighbouring forestry block is currently being harvested and we have noticed a large increase in the amount of sediment being discharged into the Mowaka, and Te Karamu streams. We are concerned that			

our mitigation efforts, to exclude stock from waterways can be undone when the trees are again harvested in 25-30 years time.	
As hill country farmers, we face extra challenges posed by the size and variable contours of our land. A 1 rule fits all approach is not practical, or sensible in regards to fencing off water bodies on hill country. Fencing and water reticulation will need to cover significant distances over difficult terrain, and will cost thousands of dollars.	

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Schedule B: Nitrogen Reference point.	We oppose the methods of calculating the Nitrogen Reference Point (NRP).	We would like to see the methods of calculating the NRP amended as follows:
	The reasons we think this are: The NRP will be based on farm management practices. It adopts a grandparenting approach.	② Consider the topography of individual properties. We think neighbouring farms of similar soil type, climate and topography should have the same NRP/ha.
	The methods of calculation are not fair and equitable across farms of similar soil type, climate and topography.	
	New farm owners are at an immediate disadvantage as they 'inherit' the NRP from the previous owner.	
	The timeframe for providing a NRP is impractical given that there are an estimated 5000 properties that will need to do this. This should not be finalised until the Proposed Plan is finalised.	

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Objective 3 Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit/Te Whāinga	We do not agree with the short term objective 3 The reasons for this are: This is does not give us any certainty for the future. This is an 80 year plan. If There is not a 10% reduction in discharges of nitrogen, phosphorus, sediment and microbial pathogens in the 1 st ten years. What then? No certainty. We need to be certain that the investment in stock exclusion fencing and water reticulation done in the 1st ten years will not be a waste of time if this objective is not met and will not be undone.	We would like to see this amended so that the Plan clearly shows how the reduction of nitrogen, phosphorus, sediment and microbial pathogens is going to be achieved over the 80 year period to provide some certainty for us and future generations.

Yours sincerei	у,			
Hamish Ritchio	e.			
	19 DLC			
		 Date 8 th March 2017		