#### **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 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.

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Signature

Signature

date

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#### Introduction

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

My name is Mark Frederikson. I farm approximately 170 Ha of my own land and lease 70 Ha on a neighbouring property within the upper reaches of the Waitomo Catchment. Of which only 160 Ha is in pasture. I farm predominately young dairy heifers but have some sheep and some beef steers. My father owned the property before me and has been in our family for approximately 60 years. I was born here. This farm was originally 276 Ha but I sold 100 Ha to the Native Forest Restoration Trust in 2007 to be retired in perpetuity. This land was also covenanted under the QE11 organisation. When my father farmed here we ran Angus breeding cows and allot more sheep, but we had no retirement land then. We allowed stock to graze steep land and bush areas.

Since I began farming we have been actively involved in The Waitomo Catchment Trust, which I am now a board member and treasurer for. I am also a farmer representative on the Waipa catchment committee. Through the extensive work alongside the Waikato Regional Council I have retired almost all of my stream ways with riparian strips as well as retiring quite a large area of bush and scrub areas as well as erosion prone land. Some land has been planted in production forestry also.

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
Schedule 1 Page 51	l support with amendments	The reasons for this are: I support the use of Farm Environment Plans but disagree with the current Nitrogen Reference Point rules.	I seek that the provision is: Amended as set out below. As an alternative I propose If a nitrogen reference point is to be calculated I believe it should be done over a 5 year period and an average taken. I also believe there should be room for previously low emitters to move up to a point and high emitters should have to definitely move down to lower than the proposed 75%. This would allow under developed farms to still develop to a point and over intensified farms to reduce their emissions.
Schedule B Nitrogen Reference Point	I support with amendments	I support the use of nitrogen reference points for individual properties but again disagree with the process being suggested to arrive at these points.	As I have outlined above (my comments on schedule 1 Page 51) but I also would like farms that have shown a history of already making reductions in emissions of nitrogen, phosphorus, sediment and



The specific provisions my submission relates to are: Page 47 Schedule B cont'd	My submission is that:		The decision I would like the Waikato Regional Council to make is:
			pathogens by way of fencing waterways, retiring erosion prone land and changing land use, be rewarded for this in their calculations for a nitrogen reference point. After all, before these measures were taken, these farms would have been emitting far greater contaminants.
Schedule C Stock exclusion Page 50	I support with amendments	I support the concept of stock exclusion from our waterways in most cases. However the sheer enormity of the task at hand and complex nature of individual properties and the huge financial burden of this means the proposed rules around it are far too stringent and would lead to inabilities for some farmers to even come close to complying.	I seek that the provision is: Amended as set out below As an alternative I propose Most waterways, wetlands and lakes in the Waikato and Waipa catchment areas are reasonably well known to the Waikato Regional Council Staff. I suggest that these are prioritized and that there is a sensible staggered approach to the fencing of these. The larger and/or more polluted of these should be targeted first with a sensible time frame(5 years) for the first stage. Then working further into the next prioritized for the next 5 years. We (farmers in the Waitomo Catchment) have a strong knowledge of the costs and time frames which this sort of undertaking has. As does the WRC staff that have been part of our

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Schedule C Contá		scheme. It takes years for plans to be made, materials to be paid for, Fencers to be available in suitable weather conditions, earthworks to prepare fence lines not to mention alternative reticulated water to be installed.
		The financial burden on some propertie would cripple them. The looming expense would also have a huge devaluing effect on some properties.
		The rules around what constitutes a waterway also need to be amended.
		I believe the Hon Nick Smith has released this week outlining guidelines for the future of stock exclusion which sets a water way limit at 0.4m deep and a lake with a circumference of 1.5km.Perhaps something along these lines could be considered.
		I also believe that once these riparian areas have been established, they in effect become a national asset in that they are no longer of any use to the farmer financially, but will continue to need maintenance in the form of weed control and fencing maintenance. As we have discovered in the Waitomo Catchment, The ongoing fence

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			maintenance and the eventual replacement of fences after 30 to 40 years can be enormous. I therefore think the current subsidies from WRC and other avenues should be continued to help implement the initial costs of fencing but also for the future maintenance.
Policy 6 Rule 3.11.5.7 Page 45	I oppose this rule	This would in effect completely remove the ability of a farm to change from a dry stock( sheep and beef ) farm to a dairy farm. Even if the contour and type of land would be suitable. This may have significant financial impacts immediately on such farms due to their market value. Also their financial arrangements could be significantly impaired.	Farms should be assessed individually through LEP's and if a property has shown low outputs of contaminants in the past, should be able to increase production for the good of the economy. Particularly if other measures are being undertaken to reduce emissions. Some farms may have already retired significant areas of less desirable land, therefore reducing their outputs of contaminants. This should be recognized when they apply for resource consent for land use change.

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Yours sincerely

Mark Frederikson

2/03/2017

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