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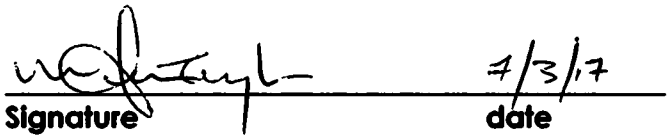
I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

I 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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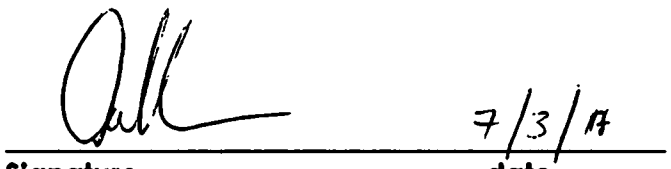

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Introduction

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

Our names are Mary Jane (Janie) Taylor and Carwyn Mellow.

We farm in conjunction with Janie's parents, John and Heather Taylor, on a 250ha drystock property in the Karapiro sub-catchment. We are the fifth generation to run this farm.

Traditionally run as a sheep farm, since 2004 the property has been run as a dairy support and beef finishing unit.

Thanks to Janie's parents and grandparent's strong environmental values, over the past four decades environmental damage on the farm has been minimised where possible. Over 25ha of native bush has been fenced off (either retired or put into QEII covenants), waterways have been fenced, native bush regeneration allowed and steep land retired for forestry. Native planting has been undertaken and there has always been an emphasis on soil and bush conversation and minimising erosion.

The cultivation approach has changed over time, with all pasture and crops direct drilled where possible to minimise soil disturbance. The farm is fertilised using a biological approach, and nitrogen based fertiliser has not been applied to the farm for many years.

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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	**REASON**	**RELIEF SOUGHT**
Stock Exclusion Schedule C, Rule 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.4, 3.11.5.6 and any consequential amendments	I support with amendments	We support the principle of keeping cattle out of waterways where practically possible. The reasons for the support with amends are: - The cost to permanently fence all waterbodies on our property will be significant – conservatively estimated in our case that a bare minimum of $150,000 will need to be spent on fencing, which is unaffordable on hill country land that does not generate much income. - It is impractical to fence allowing for the current setback distances in all instances. In many cases a bulldozer will be required to create a track which would cause significant environmental harm. - There will be additional costs and time required for noxious weed control and fence maintenance along waterways and retired pasture areas.	I seek that the provision is amended so that: - The requirement to exclude cattle from waterbodies is determined on a sub catchment and individual farm basis, where there is a scientifically proven water quality issue in relation to stock in waterbodies. - Individual farmers are given subsidies to support or fully cover the cost of compliance.

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The specific provisions my submission relates to are:	**My submission is that:**		**The decision I would like the Waikato Regional Council to make is:**
Partial withdrawal of Proposed Waikato Regional Plan Change 1.	Oppose	The Waikato Regional Council needs to consider all parties affected by Plan Change 1 as one entity. Withdrawal of part of the plan is unfair and creates uncertainty for all parties involved.	The entire plan should be withdrawn until the Waikato Regional Council treats the whole catchment as one.
Restricting Land Use Change Rules 3.11.5.6 and 3.11.5.7 and any consequential amendments.	Oppose	We oppose this because we need to be able to make business decisions based on the most economically viable options, which may require a change in land use. The impact of this plan change for us could be severe: A large decrease in the value of our farm (which could occur if it is no longer able to be potentially converted to dairy farming) will adversely affect our borrowing and debt servicing ability, which will affect our ability to expand our asset base and deliver increased business profitability. We need certainty of our future earnings to consider our future in farming and our ability to affect the profitability of our operation. As part of the Waikato and Waipa community, the potential for asset devaluation and decreased profitability will not enable us to enjoy continued social, economic and cultural wellbeing – which does not deliver to Objective 2 as outlined in proposed Plan Change 1.	Amending the land use change rules to be determined on a sub catchment and farm by farm basis, considering land class rather than current land use as the basis for land use change possibility. Council must allow for flexibility with this policy, by developing policies and rules which relate to managing adverse effects, rather than a blanket rule which is based upon existing land use.

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The specific provisions my submission relates to are:	**My submission is that:**		**The decision I would like the Waikato Regional Council to make is:**
Nitrogen Management Adopts a Nitrogen Reference Point (NRP) approach and holds existing land users to this number (Grandparenting of Nitrogen leaching) Rule 3.11.5.3, 3.11.5.4 – 3.11.5.7. Schedule B, and definition of a stock unit.	Oppose	Benchmarking nitrogen losses to historic levels could create outcomes that do not deliver improvements in fresh water quality. Higher dischargers are in effect rewarded by being able to continue to leach greater amounts, while those that have farmed conservatively and responsibly in the past are penalised by being unable to increase their NRP, if required to do so to maximise economic performance. On our farm, like many others, historically there have been significant fluctuations between stock units carried depending upon the season being experienced. Our ability to respond to a negative or favourable growing season, and therefore capitalise on the additional resulting income will be severely restricted by the requirement to be held to a historic NRP. There are inaccuracies in the stock unit calculations in the stock unit table provided by Waikato Regional Council – for example the stock units of a 199kg weaned dairy heifer is 1.6, compared to a 199kg dairy heifer aged between 1 – 2 which is 5.1. There is no stock unit given for a bull calf less than one year weaned. These stock unit calculations differ from those promoted by Beef & Lamb NZ and such variances will make it impossible to accurately input data into any programme designed to calculate Nitrogen Reference Points, including OVERSEER.	1. Remove the requirement to have to manage to an NRP based solely upon stocking rate and allow for seasonal fluctuations based on climate – by taking a farm by farm approach. 2. Use actual weights and therefore accurate stock unit measurements under "Definition – Stock Unit". 3. Ensure where OVERSEER is used that Best Management Practices are applied, including input standards, applying farm specific information and reducing use of standardised input parameters. 4. Use soil tests as a possible marker for nutrient losses.

The specific provisions my submission relates to are:	**My submission is that:**		**The decision I would like the Waikato Regional Council to make is:**
		Anecdotally there are significant Inaccuracies delivered by OVERSEER when using national averages, rather than stock weights to determine NRP.	
Farm Environment Plans *Schedule 1. Rule 3.11.5.3, 3.11.5.4, 3.11.5.6 and any consequential amendments*	Oppose with amendments	- Having to create a FEP with a Certified Farm Environment Planner will add an estimated cost of at least $4000 to our farming operation, along with significant amounts of time. On a property with one labour unit, we already have very limited capacity to spend the time required to ensure compliance and remain profitable. - Of greater concern is the potential to greatly reduce our farming flexibility depending upon climate and market change. Our stocking decisions change month by month and year by year, depending upon these factors, and our ability to respond to these signals will be hampered by the requirement to stick to a Farm Environment Plan developed years earlier. - In sub-catchments with minimal or no nutrient reduction required, there is little justification for the additional cost and bureaucracy needed to develop FEPs.	- A lower cost self generated FEP should be able to be completed - We support the Council working with industry bodies to develop Certified Industry Schemes. - Council should require FEPs in sub-catchments only where science determines that improvements are required. - Where required, FEPs need to be tailored to individual properties rather than applying blanket regulatory standards. - An independent panel needs to be available to mediate contested points between farmers and Council staff. Environment Plans need to be settled without the expensive need to appeal to the Environment Court.

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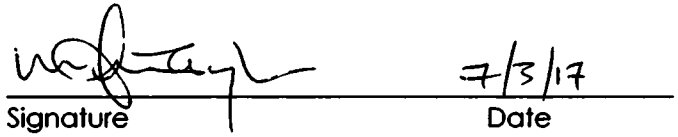
The specific provisions my submission relates to are:	**My submission is that:**		**The decision I would like the Waikato Regional Council to make is:**
Long term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit Objective 1, and Table 3.11-1	Oppose	This objective is to be commended, but these aspirational targets do not take into account the effect that all inhabitants of the region have upon the water quality. The 'Vision and Strategy for the Waikato River/Te Ture Whaimana o Te Awa o Waikato' is outlined as: *"Our vision is for a future where a healthy Waikato River sustains abundant life and prosperous communities who, in turn, are all responsible for restoring and protecting the health and wellbeing of the Waikato River, and all it embraces, for generations to come."(3)* The proposed Plan Change 1 relies solely upon the agriculture and horticulture sectors to change their business activities to improve freshwater quality. There is no mention of the impact of urban activity upon water quality, including increased storm water runoff from roads and housing developments, to introduced pest plants and species.	Withdraw the plan and replace with objectives including numerical water targets, which are achievable and which consider the involvement of all sectors of the community, with an understanding that responsibility for water quality is everyone's responsibility. These objectives should ensure that the health and wellbeing (including social and economic values) of people and communities are safe guarded, as outlined in objectives 2 and 4.

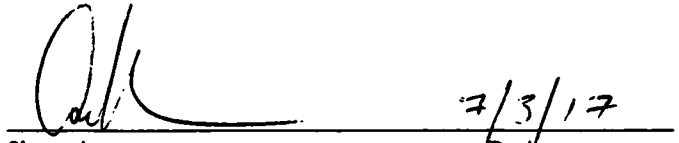
Yours sincerely

Mary Jane Taylor



Signature Date 7/3/17

Carwyn Mellow



Signature Date 7/3/17