

**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
401 Grey Street
Hamilton East
Private bag 3038
Waikato Mail Center
HAMILTON 3240

Complete the following^[1]

Full Name(s): Ben Stubbs & Rebecca Brown

Phone (hm): 07 878 7426

Phone (wk):

Postal Address: 1394 Te Anga Rd, RD8, Te Kuiti

Phone (cell): 021 042 1124

Postcode: 3988

Email: bexbee03@gmail.com

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.

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 -
WAIKATO AND WAIPA RIVER CATCHMENTS

BA Stubbs

04/03/17

Signature

date

RJ Brown

04/03/17

Signature

date

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

Introduction

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

We are Ben Stubbs and Rebecca Brown and we are sheep and beef farmer(s) in the Waikato and Waipa River catchment. Ben's family and has been farming this property for **109** years.

The Stubbs farm is a 664ha property located 14km above Waitomo Caves. The property rises from 1100ft in the west, to 1220ft in the east and sits on the edge of the Waipa fault line with views to the central plateau and central North Island. Five headwaters begin on this property. Two flowing to the Waipa and three towards Marokopa. The geology is predominantly limestone with aotea sandstone sitting underneath. The property has been farmed since 1908 by the Stubbs family and been the home to five generations.

Since the early 1980's efforts have been made to retire and enhance the property, realising the significance of its forest, wetland, and kaarst ecosystems. The first retirement of our land protected 240ha of forest with many further retirements into QEII covenant over the years. In the early 1990's a large valley and tributaries was retired as part of the Waitomo Catchment Group. This is an ongoing process with further areas identified for retirement. We have nearly retired half of the farm!!

The financial costs of this are ongoing and significant. The help from QEII and Environment Waikato has made many of these projects possible. The environment, that we now enjoy, is healing itself. This environment is also enjoyed by many thousands of visitors each year. School groups, rock climbers, cavers, trampers, scientists, trail runners, and tourists.

The farm manages to support three generations of our family, but would be regarded as marginal in the real world. My worry is that despite doing what we saw as being "right", over many years, we will now be faced with costs of compliance that will eventually overtake the viability of an operation that has clearly exceeded the vision of your document.

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

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
<i>Provision</i>	I support/ oppose/ If you support you can support but require amendments <i>(delete as required)</i> eg support with amendments	The reasons for this are: <ul style="list-style-type: none"> <i>Try to justify your response using data or by providing an example or story from your farm/ own experiences. Keep it brief. You can elaborate at the hearing. Bullet points are fine</i> 	I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below <i>(delete as required)</i> As an alternative I propose <ul style="list-style-type: none"> <i>What would be an appropriate alternative</i>
<i>Policy 2 3.11.3 c</i>	Oppose	Nitrogen reference point may limit our farm's ability to change stocking policy if markets change.	As an alternative require identified higher emitters to reduce their NRP. Allow low emitters some room to move, rather than have their NRP capped.
<i>Policy 2 3.11.3 e</i>	Oppose	Stock exclusion must be approached in a staged/targeted manner. Priority areas need to take precedence over lesser identified exclusions. In fact, water reticulation in conjunction with major key areas would make more sense. The three-year time frame is not	Stock exclusion and water reticulation must be approached in a staged/targeted manner. Key areas identified and prioritised. A farm by farm strategic approach which may take five to ten years, dependent on

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

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
		appropriate when approaching an undertaking of this scale. Both the timeframe and financial implications would make this impossible to achieve.	scale and economics. With priority given to farms seen to be heavily non-compliant. Financial assistance will be needed for this to be achieved.
<i>Policy 2 3.11.4.3</i>	Oppose (in this form)	The farm environment plan is a useful tool. My big concern is ongoing costs associated with the third party audit. If a farm can provide a plan with milestones, and prove compliance, this audit seems to be another ongoing expense with no return.	Provide an FEP, milestones. Council to check compliance without additional expense to the farmer, unless non-compliant.
<i>Policy 2 3.11.5.2 (2, 4a, c & d)</i>	Oppose	Each farm is unique. Areas to be retired must be prioritised. Assurances need to be made that any work invested in, at this time, will stand the test of time. The best solutions may come from sub-catchment groups facing similar, area specific, problems. Money must be available to encourage such groups.	While each farm is unique, sub-catchment group may serve to solve many shared challenges facing farmers.
<i>Policy 2 3.11.5.2</i>	Oppose	NRP: for low emitters there must be reasonable room to move.	Seek a fair system.

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

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
<i>Policy 2 3.11.5.2 (c, d)</i>	Oppose	This limits solution based change. Cropping, I believe, should be a consented practice and heavily monitored as, regardless of slope, measures must be in place to mitigate runoff.	Move to a consented practice, like forestry.
<i>Policy 2 3.11.5.4</i>	Oppose	FEP: may be more robust if sub-catchment based solutions are also sought. Timeframes are unrealistic. Limiting factors: financial, timeframe, compliance costs for independent FEP, uncertainty around the document.	FEP can be an empowering document, but should not lock low emitters into a financially crippling process. The nature of low reference points generally equates to challenging less profitable properties.
<i>Schedule B</i>	Oppose this in its current form.		
<i>Schedule C</i>	Oppose	More clarity is required around schedule C, the basic idea is good.	
<i>Rule 3.11.5.7 1</i>	Oppose	Need clarity as to whether this applies to stands of gorse and other woody weed species. Some would consider this regenerating forest, others weed infested farmland.	Clarify you position on this.

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

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

Yours sincerely [j2]

Ben Stubbs and Rebecca Brown

BA Stubbs and R.J. Brown

Signature

Date