

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

*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:

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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.

Mikayla Welsh

8th March 2017

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.

The trust owned farms on which I am currently employed on cover a total area of 538ha over two properties. This is a mixed operation with dairy cows, deer, replacement dairy heifers, beef cattle and dairy herd bull sires run on the properties.

The additional deer and drystock property purchased 1.5 years ago covers a total of 188ha and although it is not a neighbouring property, these two properties are run in conjunction with one another. It is situated in an area of high rainfall with a flat to steep gradient.

Below I have proposed some amendments for both the vision and strategies that this proposed Waikato Regional Plan encompasses.

The specific provisions of proposed Plan Change 1 that my submission relates to: Long term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit Objective 1, and Table 3.11-1

3.11.2 Objective 1. Long-term restoration and protection of water quality for each sub-catchment, Table 3.11-1 80-year water quality limits/targets and any consequential amendments arising from this submission point.

I support or oppose the above provision/s: Oppose

My submission is that:

1. 80-year water quality limits/targets although aspirational, in some cases such as E.Coli and Sediment are not achievable even under pristine conditions.
 - We have hydroelectric dams on the river.
 - We have deforested and introduced new plant species (pine trees in particular)
 - Pest animals and plants are here. Carp in particular in lower Waikato.
 - Cities and towns with roads and runoff and people are here.
2. Full achievement of Objective 1 and table 3.11-1, 80 year targets means that objectives relating to social, cultural, and economic wellbeing, will be massively under achieved.

The decision I would like the Waikato Regional Council to make is:

1. Withdraw the plan and replace with objectives including numerical water quality limits/targets (outcomes) that consider the reality of the Waikato, which are achievable, provide for the protection of its life supporting capacity, while also ensuring that the health and wellbeing including social and economic values of people and communities are safeguarded.

The specific provisions of proposed Plan Change 1 that my submission relates to: Stock Exclusion

Stock Exclusion. Schedule C Rule 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.6, definitions, and any consequential amendments arising from these submission points.

I support or oppose the above provision/s: Oppose

My submission is that:

1. This requirement to exclude cattle through permanent fencing is very broad and will create perverse environmental and financial outcomes over hill country, which by its nature is not intensively farmed.
2. Definition of waterbodies under Schedule C in relation to clauses i, ii, iii, and iv are still unclear. Farmers are still unable to make informed decisions about what waterbodies these rulings apply to and what become exempt due to factors such as width, depth and flow rate.
3. Fencing, maintenance and weed control on hill country is expensive. Fencing on hill country is often limited to natural ridges.
4. Water reticulation, especially on higher country is very expensive due to pumping heights.
5. Improvements in water quality from excluding cattle, through permanent fencing from permanently flowing waterbodies, on non-intensive hill country are not proven. More sub-catchment information is required.
6. Farms owned by trusts, estates or leased may not be able to raise money by mortgage to pay large amounts required to comply.

The decision I would like the Waikato Regional Council to make is:

I seek that the provisions in which relate to excluding cattle from waterbodies through permanent fencing are deleted in their entirety.

1. Addressing actual risk, targeting critical source areas, tailored farm specific critical source management, targeted riparian planting and stock management approaches are likely to result in more cost effective and improved outcomes. Blanket stock exclusion through permanent fencing is not only expensive but may be a misguided approach to management in non-critical source areas.
2. Ability to muster cattle through waterbody without requiring formed stock crossing structure when crossing less than three times weekly

The specific provisions of proposed Plan Change 1 that my submission relates to: Withdrawal of the lower part of the Waikato Catchment from PC1 (Hauraki Iwi) Partial withdrawal of proposed Waikato Regional Plan Change 1.

I support or oppose the above provision/s: Oppose

My submission is that:

The Waikato Regional Council needs to treat all its constituents affected by Plan Change 1 as one entity. Withdrawal of part creates more uncertainty for those involved than it removes.

The decision I would like the Waikato Regional Council to make is:

The whole plan should be withdrawn until The Waikato Regional Council can treat the whole of its catchment as one. Structure of land ownership has no correlation to any environmental impacts on water bodies associated.

The specific provisions of proposed Plan Change 1 that my submission relates to: Nitrogen Reference Point (grandparenting existing users to a historic nitrogen leaching number)

Nitrogen Management Adopts a Nitrogen Reference Point (NRP) approach and holds existing land users to this number (Grandparenting of Nitrogen leaching), Schedule B, Rule 3.11.5.3, 3.11.5.4, - 3.11.5.7

I support or oppose the above provision/s: Oppose

My submission is that:

1. The approach of bench marking nitrogen losses to historic levels (2014/15 or 2015/16) will create perverse outcomes. Farming practices will change. Higher dischargers have no incentive to reduce. Farmers in other catchments will farm to increase their NRP to increase farm values and potential production.
2. Application of the NRP reference will produce significant inequalities between neighbours leading to animosity – not a recipe for a resilient community. If a property's NRP is lower because of previous conservative management then opportunities for innovation will be severely reduced. Just because that property was at a different stage of ownership and development when plan change notified. Carried forward these properties will be stuck in time.

The decision I would like the Waikato Regional Council to make is:

Remove the requirement for extensive operations (at or under 18 Stock units) and sheep and beef farmers to have to manage to a NRP through these provisions. Problems around recording and accuracy, model accuracy, as well as injustice between farms outweigh any benefit.

The specific provisions of proposed Plan Change 1 that my submissions relates to:

3.11.4.10- Accounting System and Monitoring

I support or oppose the above provision/s: Oppose

My submission is that:

1. Sub-catchments that are currently un-represented in the existing monitoring networks will be skewing the current baseline data. Therefore any monitoring plan devised from this data will be inaccurate.

The decision I would like the Waikato Regional Council to make is:

Remove any council established and publicly available accounting system in each Freshwater Management Unit until the data required becomes available.

Before any monitoring plan is devised first have a strong understanding of the current situation and contributors in their entirety.

The specific provisions of proposed Plan Change 1 that my submissions relates to:

3.11.5.2 Permitted Activity Rule- Rule 3.11.5.2 4 C,D

I support or oppose the above provision/s: Oppose

My submission is that:

1. 15 degrees slope is an arbitrary value for both cultivation and grazing, replacing instead with thresholds relevant to intensity of farming.
2. Winter forage crops and their environmental impact can vary immensely. They play a vital role in a farming business providing feed when demand can outweigh supply.

The decision I would like the Waikato Regional Council to make is:

Remove the degree of slope for both cultivation and grazing replacing instead with thresholds relevant to intensity of farming.

Remove the restriction of grazing winter forage crops in situ.

The specific provisions of proposed Plan Change 1 that my submission relates to: 3.11.4.3 Farm Environment Plans

3.11.4.3 Farm Environment Plans and any consequential amendments arising from these submission points.

I support or oppose the above provision/s: Support with amendments.

My submission is that:

1. There is no supporting evidence that there are currently enough certified Farm Environment Planners available to farmers.
2. Farmers will have to convey this cost and this may cause some farming business to become unable to comply, as cost may not be able to be carried.
3. The plan has to be workable, flexible and allow for variables.

The decision I would like the Waikato Regional Council to make is:

Allow farmers to either hire the services of a certified Farm Environment Planner or write the Farm Environment Plan themselves, as long as it complies with minimum requirements set by the Waikato Regional Council.