

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

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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 a similar submission I would consider presenting a joint case with them at the hearing.


Signature

1/3/17
date

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Introduction

Thankyou for the opportunity to submit on the Waikato Regional Council's Proposed Plan Change 1.

Rosemary and I farm 550ha of rolling medium hill on Mangaorongo Road, Mahoenui. We have spent a lifetime in farming, including South Island, Raetihi, Otorohanga prior to here. Quality farming has been achieved on all of these farms with land and the environment of utmost importance, as with the majority of farmers.

In our opinion the integrity of the Waikato Regional Council involvement with the Healthy Rivers Plan is questionable. Firstly, the mechanisms they are using with the 'Overseer – Nitrogen Reference Point,' achieves 30% variance so cannot be used as an accurate tool.

Also, the Waikato Regional Council convey the wrong attitude towards farmers that have made honest progress towards Environmental improvements to their farms already, for example poplar planting, retiring land, water reticulation to every paddock and culverts/bridges for stock crossing.

We have spent an excess of \$200,000 per year maintaining our farm. Whilst also allowing Waikato Regional Council to fly from our land & to pre-feed 1080 to the Whareorino Area.

I feel this whole Healthy Rivers Environmental Plan needs a major rethink. As it was only passed by a casting vote, therefore creating a lot of doubt for all New Zealanders.

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Nitrogen Reference Point

Policy 2 and 7 Rules 3.11.5.3-3.11.5.7 Schedule 1. And any consequential amendments arising from these submission points.

We oppose the way it is set up, differentiating between Dry Stock Farming and Dairy farming.

- 1. As it rewards the High end Nitrogen users**
- 2. Ignores and in fact penalises the low end users**
- 3. Use of the Overseer, which had 30% variance, a mechanism that should not be used to establish a Nitrogen Reference Point in Dry Stock Farming.**
- 4. Nitrogen Reference Point is already being asked as a question to Real Estate inquiries.**
- 5. No recognition for any Environmental work already done of farms.**
- 6. Land values will decrease because the Nitrogen Reference Point limits the increase in production, in fact production will decrease.**
- 7. Trust is reducing because of the people involved in setting up the Waikato Regional Councils Healthy River Scheme are inconsistent and inexperienced in farming practices.**

Recommendations

- 1. Nitrogen Cap set at 30kg/N/ha for all farms. Farms higher than 30kg/ha pay a fee for this right as they are Polluters.**
- 2. Under 30kg/ha Nitrogen cap are Non Polluters, and therefore should have minimum restrictions imposed on them. They should be expected to still fence main water ways (lakes, rivers), although not smaller creeks as they are not a problem. Non Polluters should have an Environmental plan to back this up.**
- 3. Need a more reliable tool of measuring Nitrogen than an Overseer, which is a tool that is not proven by science.**

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Restricting Land Use Change

Policy 6. Rule 3.11.5.7 and any consequential amendments arising from these submission points.

We oppose in principal to the right of freehold land not being able to change their land uses if the need arises.

- 1. As farmers may need to increase production to meet financial requirements. Stopping farm progress. The right of Freehold land has been severed.**
- 2. Farmers may want to change stock to Dairy grazers, if the need arises.**
- 3. Land values will be impacted if farmers are not able to intensify stock numbers. There is a major difference of intensification between Dairying and Drystock farms already.**
- 4. There will be an increase in Waikato Regional Council rates and also Local body rates. The farmer will inadvertently pay for the cost throughout this whole process**

Recommendations

- 1. Setting a nitrogen Cap of 30kg/N/ha for Drystock farmers would alleviate this problem.**
- 2. Fencing of lakes, rivers & major interior creeks required. However minor creeks are not required, as they are not the problem.**
- 3. Changing Forestry land to Dairy is not permitted at all.**
- 4. Dairy conversions are strictly controlled to meet Environmental expectations.**
- 5. High end Nitrogen capped farmers are controlled and pay for any excess Nitrogen Caps.**

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Farm Management Plans

Policy 2. Rule 3.11.5.3 - 3.11.5.7 and any consequential amendments arising from these submission points.

We believe these need adjusting and simplified for the low-end Nitrogen users.

- 1. The cost of \$5000-\$8000 for a Farm Environment Plan by unknown personnel is extremely excessive.**
- 2. Consideration should be given for Environment work already achieved on farms**
- 3. The cost of fencing, water reticulation and other Healthy River requirements needed to make Farm Environment Plans achievable is excessive. Some farms will have costs of \$800,000 plus. It is a large investment, for absolutely no return.**

Recommendations

- 1. Compensation should apply to cover the costs incurred to meet requirements. Which could come from the fines from the High End Nitrogen users ie; The Polluters**

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Our Trust & the Integrity of the Waikato Regional Council

The Waikato Regional Council **are not applying a level playing field for all concerned.** For example:

1. There is **one rule for Iwi** – for example removing 150,000ha from the Regional Plan in Northern Waikato.
2. Allowing Dairy Farmers a higher Nitrogen Cap. This is totally dangerous to the environment, not to mention the 30% variance in Overseer programme could have dairy farms with a Nitrogen Cap of 70kg/ha. Which could in fact be up to 90kg/ha if tested honestly.
3. With differing rules how can we as farmers trust what will happen in 10years time with the regional plan.
4. The only fair solution is **apply a 30kg/ha Nitrogen cap on all farmers and penalise severely the farmers that go above the 30kg/ha Nitrogen cap.**
 - If Waikato Regional Council had applied the same environment rules for all farmers at the time, in the South Waikato to the 40,000ha converted from Forestry to Dairy (Landcorp). We would not be in this position today. Covering up the obvious.

We need positive views from all concerned and consideration from all, not a political shambles this whole Environment plan has become.