

PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 WAIKATO AND WAIPĀ RIVER CATCHMENTS



Submission form on publicly notified – Proposed
Waikato Regional Plan Change 1 – Waikato and
Waipā River Catchments.

**Important: Save this PDF to your computer before answering.
If you edit the original form from this webpage, your changes
will not save. Please check or update your software to allow
for editing. We recommend Acrobat Reader.**

FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

SubForm	PC12016	COVER SHEET	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

SUBMISSIONS CAN BE

Mailed to	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
Delivered to	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
Faxed to	(07) 859 0998 Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses
Emailed to	healthydrivers@waikatoregion.govt.nz Please Note: Submissions received by email must contain full contact details.
Online at	www.waikatoregion.govt.nz/healthydrivers

We need to receive your submission by 5pm, 8 March 2017.

YOUR NAME AND CONTACT DETAILS

Full name: Brian and Debbie Steele
 Full address: 174 Wood Road, R.D, Waitoa, 3380
 Email: brainssteele24@gmail.com
 Phone: 07 8871751 Fax: _____

ADDRESS FOR SERVICE OF SUBMITTER

Full name: _____
 Address for service of person making submission: _____

 Email: _____
 Phone: _____ Fax: _____

TRADE COMPETITION AND ADVERSE EFFECTS *(select appropriate)*

- I could / could not gain an advantage in trade competition through this submission.
- I am / am not directly affected by an effect of the subject matter of the submission that:
- adversely effects the environment, and
 - does not relate to the trade competition or the effects of trade competition.

Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO

Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1 (Continue on separate sheet(s) if necessary).

Schedule B - Nitrogen reference point
Schedule C - Stock exclusion
Rule 2
Rule 3
Rule 6
Rule 7

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

(Select as appropriate and continue on separate sheet(s) if necessary).

- Support the above provisions
- Support the above provision with amendments
- Oppose the above provisions

MY SUBMISSION IS THAT

Tell us the reasons why you support or oppose or wish to have the specific provisions amended. (Please continue on separate sheet(s) if necessary).

My wife and I have lived on and owned our property since 1989. We were both born in the Waikato and have spent all of our lives living here. Whilst we support the overall outcome desired by the proposed plan, we are unable to support it in its current form.

Please see attached document for further information

I SEEK THE FOLLOWING DECISION BY COUNCIL

(Select as appropriate and continue on separate sheet(s) if necessary).

- Accept the above provision
- Accept the above provision with amendments as outlined
- Decline the above provision
- If not declined, then amend the above provision as outlined

PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

- I wish to speak at the hearing in support of my submissions.
 I do not wish to speak at the hearing in support of my submissions.

JOINT SUBMISSIONS

- If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

- Yes, I have attached extra sheets. No, I have not attached extra sheets.

SIGNATURE OF SUBMITTER

Signature: B. Steele

Date: 03/03/17

Personal information is used for the administration of the submission process and will be made public. All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal information.

PLEASE CHECK that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION

Section number of the Plan Change:

Do you support or oppose the provision?

Support Oppose

Submission

Decision Sought

State in summary the nature of your submission and the reasons for it.

State clearly the decision and/or suggested changes you want Council to make on the provision.

Section number of the Plan Change:

Do you support or oppose the provision?

Support Oppose

Submission

Decision Sought

State in summary the nature of your submission and the reasons for it.

State clearly the decision and/or suggested changes you want Council to make on the provision.

ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION

Section number of the Plan Change:

Do you support or oppose the provision?

Support Oppose

Submission

Decision Sought

State in summary the nature of your submission and the reasons for it.

State clearly the decision and/or suggested changes you want Council to make on the provision.

Section number of the Plan Change:

Do you support or oppose the provision?

Support Oppose

Submission

Decision Sought

State in summary the nature of your submission and the reasons for it.

State clearly the decision and/or suggested changes you want Council to make on the provision.

Submission against Healthy Rivers Wai Ora Plan Change One

By Brian and Debbie Steele

We are submitting for amendments to the Healthy Rivers Plan Change One as outlined for each of the sections below.

Schedule B

The nitrogen reference point (NRP) for each farming business and the calculation of this reference point by a rolling average (or grand-parenting) is not agreeable by us. Figures required to reach this point are open to manipulation in regard to the accuracy of feed inputs each year, fertilizer application rates and the timing of these; adjustments to these figures can give a major change in the outcomes of a nitrogen reference point.

An example of this is during years with a decrease in income, feed inputs are changed and fertilizer applications are deferred. This results in inaccurate averages. The suggested grandparenting years of 2014/15 and 2015/16 coincide with a low dairy company pay out and this resulted in less feed and fertilizer inputs on dairy farms, and therefore a lower than normal base has been used to calculate a true historical nitrogen reference point.

In addition, the use of overseer in the calculation of this NRP is also a concern as there are many inaccuracies with the programme. Our answer to this would be a longer time frame to come up with a nitrogen reference point to reduce some of the seasonal changes which happen in farming businesses due to weather which affects production and also prices for production which can influence business income, and therefore expenditure.

The establishment of the reference point will also have a negative effect on the capital value of each farm as it will be used as a feature in land sales (and also an effect on land production).

Schedule C, Social and Economic Costs

We would also draw attention to the social and economic costs to the region with the implementation of this plan in its current form. Research has indicated a loss of jobs and also different projections of financial cost ranging from \$1-8 billion. The cost to many of the dry stock properties in regards to stock exclusion, fencing, water articulation, and steep land retirement will make many of these businesses unviable. The effects on profitability of dry stock businesses will make some enterprises unviable due to cost of fencing, loss of land for production reduction in salable land, and we do not foresee any positive outcome for any parties involved.

Added to this are the variations in prices for production and weather events such as flood and drought. Stress levels to farmers and staff and flow on effects to stakeholders and rural towns should be taken into consideration. Extending the proposed date for implementation would allow more time for research on proposed outcomes and implementation of new regulations for stock exclusion.

Rule 2, Microbial Pathogens

We acknowledge that following a significant weather event *E. coli* levels spike in our regional waterways, and livestock farming is in part a contributor to the problem. Other causes need to be addressed and acknowledged when introducing new limits in waterways. This is in regard to stormwater contributions from urban stormwater systems, in particular waterways and bodies in the Lower Waikato have a high level of *E. coli* due to large populations and concentrations of waterfowl and pest species of fish. An example of an area with high microbial activity is Hamilton Lake (Rotoroa) and this has had no farming contributions. We would also like the limits set in waterways in regard to *E. coli*, nitrogen and phosphorous to be the same nationwide and not have different limits for each regional council plan.

Rule 3, Slope

Under the proposed plan we also have concerns in regard to the proposed regulations in the farm environment plan with the rules on land over a slope of 15 degrees, however we support the fencing of permanent waterways over 1m in width. This will capture many hectares of currently productive farmland and place restrictions and limit the output of such land. We would be against the proposed restrictions on land over 25 degrees as this would lead to many hectares of woodlocked forestry or regenerating native forest. The cost of fencing this land would be borne mainly by the landowner; weed control again would be a major issue for the landowner as the fenced area of streams become a reservoir for weed species and animal pests.

Rule 6 and 7

Our primary concern here relates to the proposed land use restrictions. I believe that the current regulations from both Waikato Regional Council and also supplier regulations from our dairy companies have headed our industry in the right direction in regard to improvements to the environment. I believe the land use restrictions will trap us in 2016 and science will evolve to assist us to make desired improvements. Introduction of sustainable milk plans in the Upper Waikato and Waipa have bought numerous voluntary improvements by farmers and landowners. These will evolve into farm environment plans (FEP's) under the current proposed plan and I do not think there are currently enough people with the right level of technical expertise or training to get the required FEP's done within the proposed schedule.

We also believe that within the proposed 80 year time frame of the plan, population growth and urban sprawl will place great pressure to provide food and vegetable crops both for local consumption and export will be required from the better soil types in the Waikato. This will be greater if the Pukekohe soils are not saved for food production for Auckland. Examples in the

Waikato now are the onion and potato growers using class 1 soils in the vicinity of Matamata. Milk production for the Waikato factories may come from further growth in the North Island as transportation and technology to de-water milk is improved and enhanced.

In addition, the need for the consenting process to administer land use restrictions will create a greater bureaucracy than the regional council currently have, and the cost of this will be passed onto the ratepayers, consent holders and applicants. We perceive a loss of landowner rights should this proposal be passed in its current form. Again I refer to the information that is currently required for the Dairy company supply regulation and existing regional council rules.

In conclusion, we acknowledge that we do not live in the catchments involved in the current Healthy Rivers Plan Change One. We wish to see many of the issues dealt with and seek positive outcomes for all parties before the process begins involving the waterways of the Eastern Waikato. We also see increased costs and the effects to many businesses and stakeholders in the adoption of the plan in its current state and seek amendments. We have seen DairyNZ and Federated Farmer's submissions which we support.

We wish to be heard.