

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

Submission Form

Submission on a publicly 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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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.

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Tracey Anne Neal

TA Neal 1/3/17
Signature date

Craig Andrew Lamont Neal

CA Neal 1/3/17
Signature date

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Introduction

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

We are Andrew and Tracey Neal and we currently farm the 636 hectare property known as Potawa in the West Coast catchment.

The Neal family have farmed this property for over 100 years, having successfully balloted the original property in 1910 and converted it from bush into pasture over the subsequent years, while leaving many areas in original bush.

It has always been a sheep and beef property, which the majority of the land is the most suitable for. At the current time we winter approximately 6000 stock units in a 60/40 sheep to beef ratio. This ratio however has changed through time depending on a number of factors including weather, feed conditions and stock availability among others. This flexibility is important for many reasons, not least is animal care and welfare.

Andrew purchased the farm from his parents in 1986 and has in the ensuing 31 years retired three areas into QEII conservation, fenced off streams and waterways and steeper areas have been fenced and planted in either native or introduced plantings.

We farm within a karst limestone landscape and have a policy of excluding stock as much as is practicable from areas of water movement however due to the rock formations through much of the farm this is not always possible, both physically and financially.

We have in the last 3 years also embarked on a reticulated water system through the home farm which for 97 years relied on natural water. This was done due to our own desire to supply continuous water to our stock and the natural instinct of livestock to drink from troughs by preference. The benefit to our natural waterways has been marginally noticeable, the natural water on our property generally not suited to standing in or significantly erodable.

Our next project is the establishment of a fenced wetland in a swampy area of our second block which due to topography and aspect is unsuitable to attempt draining.

We are firm believers in the need to be environmentally conscious and sensitive to the land that we inhabit and utilise. If we do not care for it, we will not be able to farm it for long, which is why we approach all our decisions in a holistic manner. Our chemical inputs are minimal, our fertiliser use is a considered targeted decision and we work hard 365 days of every year to ensure this property will be well husbanded and cared about for future generations.

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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 below. 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.

We oppose the proposed Plan Change 1 on the grounds that it places all of the requirement for change on farming operations yet not on any other communities, will have a severe economic impact on farming operations in the hill country of the area, without providing scientific proof that the proposals will improve water quality. The Plan Change 1 also fails to provide any certainty for our future. We therefore seek that the plan in its current form be declined.

The specific provisions of proposed Plan Change 1 that our submission relates to:

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, definitions, and any consequential amendments arising from these submission points.

We support or oppose the above provision/s

Oppose

Our submission is that:

1. Hill country due to its nature is not intensively farmed. Fencing on hill country is expensive and difficult, in many cases dangerous, so it is often done to natural fence lines, hill ridges and gullies. On our property it would be financially crippling to completely exclude cattle through permanent fencing from permanently flowing waterways.
2. Water reticulation on hill country is very expensive and difficult due to pumping heights, contour difficulties, access and lack of options for pumping.
3. Maintenance and weed control is expensive on land that is not earning much.
4. There is no proof of improvements in water quality from excluding cattle through permanent fencing from permanently flowing waterways on non-intensive hill country. More sub-catchment information is required.
5. Tailored farm specific management plans, including riparian planting and stock management approaches are more likely to result in better farmer compliance and improved environmental outcomes.

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6. The term wetlands is not clearly defined and open to wide interpretation which potentially leads to excessive loss of grazeable land.

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

We would ask that the provisions which relate to excluding cattle from waterbodies through permanent fencing are deleted entirely.

As an alternative we propose that

1. The rules requirement to exclude cattle through permanent fencing be tailored on a farm by farm basis, district by district, and sub catchment basis where there is a scientifically proven water quality issue in relation to stock access to waterbodies. We ask also that the rules are tailored to specifically address the issue, i.e. in relation to certain land uses and terrains with logical flexibility to provide for alternative management approaches to achieve the same outcome – cattle exclusion.
2. Enable stock to enter waterbodies while being actively managed across the waterbody without requiring formed stock crossing structure, when crossing less than four times weekly.

The specific provisions of proposed Plan Change 1 that our submission relates to:

Restricting land use change.

Policy 6

Rule 3.11.5.7 and any relevant points within the plan

We support or oppose the above provision/s

Oppose

Our submission is that:

It will affect the value of our land and interfere with any future ability to develop and grow our businesses.

It will also affect the ability to market our land in the future should it be suitable for dairying, and effectively removes huge amounts of equity, due to drop in value of land.

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

Entirely deleted. It would be more appropriate to assess land capability through individual Farm Environment Plans (FEP) rather than a one size fits all approach.

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The specific provisions of proposed Plan Change 1 that our submission relates to:

Nitrogen management application of the Nitrogen Reference Point (NRP) and the use of OVERSEER

Policy 2 and 7

Rules 3.11.5.2 to -3.11.5.7(inclusive)

Schedule B and all other areas in PC1 which refer to the Nitrogen Reference Point

We support or oppose the above provision/s

Oppose

Our submission is that:

1. We oppose this grandparenting approach (holding users to their Nitrogen Reference Point).
It penalises the low emitters – who will no longer be able to develop their farms (they may develop their farms but they will be unable to stock them with these rules) to help pay for the cost of mitigation against the other contaminants
2. We have not seen that there is any scientific evidence that a blanket rule for nitrogen restriction will be of any benefit.
3. We oppose the use of OVERSEER as a means of determining the NRP – it relies on a wide number of assumptions, the accuracy of OVERSEER for drystock and particularly trading properties is apparently very poor (50% variation) and can vary depending on the information that is entered into it. It was never designed to be used for this purpose.
4. The years chosen to determine the NRP value were drought years, therefore stocking rates were very low – this will mean we are restricted to carrying lower numbers of stock (cattle in particular) going forward.

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

We seek that the Nitrogen Reference Point and use of OVERSEER are removed from the plan in their entirety.

We suggest a sub-catchment approach to addressing contaminants that are relevant to each farm, not a blanket restriction of one particular nutrient that may not even be relevant to the water bodies in that sub catchment.

Use FEP's to determine what would work best on each farm, and science to determine which contaminants are an issue in each sub-catchment.

Amend the rules so that they are science based, not based on grandparenting (holding land uses and land users to historic leaching rates, stocking rates, and land uses).

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The specific provisions of proposed Plan Change 1 that our submission relates to:

Farm Environment Plans

Schedule I. Rule 3.11.5.3, 3.11.5.4, 3.11.5.6 and any consequential amendments arising from this submission point.

We support or oppose the above provision/s:

Oppose

Our submission is:

1. The application of Farm Environment Plans (FEP) as proposed has the potential to greatly reduce farm flexibility in times of climatic and market fluctuations especially on trading properties.

Decisions which are based on climate and market fluctuations in times of stress will be made more difficult when needing to account for other factors such as effect on NRP, using a crop area outside plan or needing to run cattle in a designated sheep only area.

2. Some sub-catchments have no reduction or minimal reduction of nutrients required so imposition of cost and bureaucracy of environment plants is not warranted.

3. There appears to be no low cost appeal processes available. This leaves open possibility of inconsistency between farms and areas.

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

1. Council should require farm environment plans only in sub-catchments where science indicates improvements are required.

2. FEP's should be produced by the landowner with WRC guidance and support.

3. Environment plans need to be written to allow flexibility and good management practices and should be tailored to the individual property

3. An inexpensive, independent panel needs to be available to allow contested points between staff and farmers. FEP's should be contested without the expensive need to appeal to Environment Court

4. The rules should be focussing on reducing the environmental impacts from intensive agriculture (>18su/ha) especially that of dairy factory farming rather than applying blunt and inappropriate rules to extensive agriculture.

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Yours sincerely

T. A. Neal

C. A. C. Neal

T. A. Neal

C. A. C. Neal