

**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  
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Hamilton East  
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*Complete the following*

**Full Name(s): Anna Mary Wildman**

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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.**

## **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.

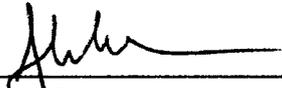
My name is Anna Wildman and I am the third-generation farmer of our family farm in the Mangapu catchment. I returned to the farm 5 years ago, and took over management of the property in 2015. The property has been in our family for 65 years following my grandparents being allocated the farm through the war ballots.

One of the key reasons for us being able to retain the farm in the family over the years has been our ability to change stock classes where necessary and adapt to climatic and market changes. My father developed the property into a Deer farm in the 80's purchasing the neighbouring two farms which bought our total land area to 650ha. In the early 90's due to financial pressures we sold 40ha and converted 150ha into a forestry investment partnership. We now farm on 450ha of rolling contour with a small percentage of steeper sidling's. We are predominantly a dairy grazing operation and carry some deer and beef stock.

Our family is committed to the sustainability of our property as it is in a beautiful area surrounded with limestone caves and native bush. Over the past 20 years 40ha's of the farm has been retired into plantation forestry and protection of waterways with further areas planned for retirement.

Conversion of the 150ha forestry partnership block back into pasture following harvest has been part of the long-term plan for our farm which would enable us to expand and develop our operation to be more financially viable. This plan has a severe impact on the planned future of our farm and its ability to remain profitable.

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Signature

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date

## 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
Objective 1	I Support	I agree with the vision for long term improvement and restoration of our waterways however I have concerns with the water quality targets laid out in the plan and whether these are realistic.	
Objective 4	I support with amendments	I agree with objective 4 in supporting people and community resilience however I have concerns that the large financial investments for farms required from PC1 and the uncertainty of the future plans will have a negative impact on our people and communities.	<p>I seek that the provision is: amended as set out below</p> <p>More work needs to be completed on the costs of implementing this plan on farmers and the impact this will have on people and community resilience.</p> <p>An understanding of what will be required in the future years should be provided now so that farmers can plan for this.</p> <p>Clause B should be removed in it's entirety.</p>

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<p>Restricting land use change.</p> <p>Policy 6</p> <p>Rule 3.11.5.7 and all other areas in PC1 which refer to restricting land use change.</p>	<p>I oppose</p>	<p>The reasons for this are:</p> <ul style="list-style-type: none"> <li>• Having a blanket rule for land use change prevents any development for farms and will have major impacts on land values of land with low nitrogen reference points.</li> <li>• There are different issues affecting different sub catchments so a change in land use should not be solely based on whether we are increasing our NRP but whether we are putting a plan in place to manage our environmental quality and control sediment and contaminant losses. It is important that people still have the ability to develop their properties while remaining sustainable.</li> <li>• We have 150ha in a forestry partnership which has always been planned to be converted back into pasture which would have enabled me to expand the family business to make us more financially viable in the future. In our catchment, there are greater issues with sediment than contaminant losses so we should be tackling these issues when changing land use.</li> </ul>	<p>I seek that the provision is deleted in its entirety</p> <p>As an alternative I propose</p> <p>That any land use changes still be regulated through a controlled process but that the land use change should be managed through a Farm Environment Plan to ensure best practice in mitigating contaminant loss and other factors affecting our waterways.</p> <p>The consent process should not just be subject to whether the NRP for the property will increase as nitrate losses and not an issue for many sub catchments.</p>
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<p>Provision The Nitrogen Reference Point (NRP) Policy 2 and 7 Rules 3.11.5.2 to - 3.11.5.7 Schedule B and all other areas in PC1 which refer to the Nitrogen Reference Point</p>	<p>I oppose</p>	<p>The reasons for this are:</p> <ul style="list-style-type: none"> <li>• The use of the NRP is grandparenting and rewards the high emitters enabling them to remain flexible and able to develop their businesses.</li> <li>• Low production Farms are being penalized with no ability to change farming operations to meet the needs of the market. Why should a dairy farm and a neighboring drystock farm have different reference points?</li> <li>• The NRP is being applied to all farms regardless of whether this is an issue for their catchment. Drystock farmers will generally have much lower NPR's which is reflected when looking at the issues facing each subcatchment.</li> <li>• Basing the NRP on just two years is unfair. Many factors could have had an impact on a business's farming operation i.e. droughts, changing stock policies to meet a farmers age or health issues.</li> <li>• I do agree that the top emitters should have to reduce their emissions.</li> <li>• The use of overseer to determine the NPR is a concern due to the fact that the system was never designed to be used as a regulatory tool and there are many variables that can impact the results.</li> </ul>	<p>I seek that the provision is deleted in its entirety</p> <p>As an alternative I propose</p> <p>That more work is done on addressing contaminant loss through a sub catchment approach. There should be increased use of technology and water monitoring to support the identification of sub catchment issues.</p> <p>Farm environment plans should be used as the primary tool to manage nutrient losses in line with the sub catchment approach to ensure that farming activities are working to improve the environmental issues for the targeted catchment.</p> <p>Nitrogen Reference Points should still be used to support the farm environment plans and farms with high emissions should still be required to reduce their nutrient losses.</p>
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<p>Stock exclusion</p> <p>Policy 1 &amp; 2,</p> <p>Rules 3.11.5.1,3.11.5.2, 3.11.5.3, 3.11.5.4 and Schedule C and all other areas in PC1 which refer to stock exclusion</p>	<p>I support but require amendments</p>	<p>The reasons for this are:</p> <p>I agree that stock should be excluded from waterways however there is no evidence to confirm that the level of fencing required by this plan will have any impact on water quality and more realistic fencing requirements should be used, such as the requirements released in the Governments report from Feb-17.</p> <p>We have the Mangawhitikau Stream running through our property as well as many drains and waterways on the property feeding into this. While a lot are already fenced off it will be a major project to complete the remaining fencing and I'm concerned with the level of fencing required within this plan that it may not all be achievable in the timeframes set however the fencing standards set in the Governments new water quality standards would be achievable.</p> <p>The requirement for livestock crossing structures may be impractical and expensive to install and maintain for some waterways. The stream running through our property is a shallow stream on flat land and changes its path regularly. This will make maintaining stock crossings difficult.</p> <p>The requirements for fencing of waterways and riparian planting are expensive yet the plan doesn't mention any financial support for farmers.</p>	<p>I seek that the provision is: amended as set out below</p> <p>Guidelines for stock to be excluded from waterways should follow the requirements outlined in the governments clean water report released in February. On rolling to steeper country up to a 15 degree slope only waterways over 1m wide at any point are required to be fenced.</p> <p>Funding should be made available to support farmers in fencing off larger waterways and riparian planting.</p> <p>Stock should be able to be managed across a waterway without a crossing structure if the number of crossings are limited to X crossings per week.</p> <p>There needs to be a realisation that the requirements for fencing on some properties will be impossible to comply with within the timeframes set and there should be some flexibility to manage the timescales through the farm environment plans and in line with the Governments new water quality standards released in Feb-17</p>
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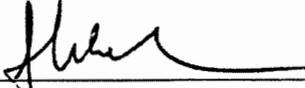
<p><i>Sub-catchment planning</i></p> <p><i>Policy 9</i></p> <p><i>Implementation method</i> <i>3.11.4.5</i></p>	<p>I Support</p>	<p>The reasons for this are:</p> <p>The area identified for the healthy rivers plan covers many different farming operations over many land types. This plan sets out to treat all land the same and does not focus on the individual issues facing each catchment.</p>	<p>I seek that the provision is: amended as set out below</p> <p>Further work should be carried out at the sub catchment level to determine the specific water quality issues affecting each area. FEP's should then be used to tackle the specific issues relevant to the catchment.</p>
<p><i>Farm Environment Plans</i></p> <p><i>3.11.4.3</i></p> <p><i>Schedule 1</i></p> <p><i>Schedule 2</i></p> <p><i>Rules 3.11.5.3</i></p>	<p>I Support</p>	<p>The reasons for this are:</p> <p>I feel that the farm environment plans will be a good tool for us to drive our farming operation while improving environmental quality. As these are tailored to the individual farm I feel they should drive what changes need to be carried out on the farm.</p>	<p>I seek that the provision is amended as set out below:</p> <p>FEP's should be used to define how the farm manages environmental quality instead of blanket rules such as land use change and nitrogen reference points.</p> <p>The cost of producing an environmental plan though a certified industry planner should not be prohibitive. Costs for this should be supported by the council.</p> <p>The timescales for completion of the FEP need to be realistic and for this there needs to be an assurance that there are adequate certified planners in place.</p>

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Partial Withdrawal of Proposed Waikato Regional Plan Change 1	I oppose	The reasons for this are:  The removal of a large area of the plan will have an impact on achieving the water quality targets.	That PC1 be put on hold until the consultation with Hauraki iwi authorities is completed.
Policy 16	I oppose	The reasons for this are:  That any rules set as part of this plan should apply to all land regardless of who owns the land	I seek that the provision is deleted in its entirety

Yours sincerely

Anna Wildman

  
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 Signature

8/3/17  
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 Date