

**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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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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St Gilbert 4/3/17
Signature date

[Signature] 04/03/17
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 Ben and Leanne Gilbert and we are 5th generation sheep and beef
farmers from Oparau, in the West Coast catchment.

We have been farming for four years. We lease the 550ha family farm from
Ben's parents and have also purchased a neighbouring 160ha from Ben's
grandmother.

This is a sheep and beef breeding farm. The stocking ratio fluctuates
between these two stock classes depending on market and climatic
conditions.

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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 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	We support with amendments	We support the vision of healthy, clean waterways for everybody to safely enjoy. However we are concerned that the plan will not achieve this and will only succeed in being detrimental to our farming business, the local community and the possibility of succession of our multi-generational farm.	We seek this objective be amended to a sub-catchment approach, where targets are tailored to the waterways within our catchment.
Objective 2	We support with amendments	The survival of our rural community is dependent on its economic viability. We support the intent of Objective 2, however we believe elsewhere in the plan this objective is not supported. If this plan goes ahead as written, we also have grave concerns for the mental health of our community members. Rural suicide is already a problem in our country, without the added financial burden this plan would create (as discussed elsewhere).	We seek that a thorough economic analysis be done showing the cost of implementing this plan at a farm level. Also, the financial implication for small rural communities with developable land i.e. gorse blocks be investigated.

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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
<p>Nitrogen Reference Point and the use of OVERSEER</p> <p>*Rules 3.11.5.2 – 3.11.5.7 inclusive</p> <p>*Schedule B</p> <p>*All other references to the use of a Nitrogen Reference Point</p>	<p>We oppose</p>	<p>We do not support the use of a fixed Nitrogen Reference Point ("grandparenting approach"). This approach punishes low emitters by preventing any expansion and rewards high polluters by allowing continued high emission. We took over our business four years ago from family who had been running minimal stock with no fertiliser. This coincided with back to back droughts. As a result, if a NRP was to become a reality, we would be restricted to a stocking level that would be uneconomic due to the actions of previous farmers who had no debt and so could afford to farm this way.</p> <p>Our business relies on the ability to swing between beef and sheep markets depending on the financial viability of each market. A fixed NRP would prevent moving further into the cattle market, which may be necessary in future seasons.</p> <p>Due to our small size and debt levels, the introduction of a NRP would mean our only option would be to walk away from the family farm. This is the opposite of what Objective 2 is trying to achieve.</p> <p>The introduction of a NRP would also make buying</p>	<p>We seek the removal of the Nitrogen Reference Point and OVERSEER from the plan and replace this with a sub-catchment approach using farm environment plans.</p>

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	<p>any run down land, i.e. gorse covered land, pointless as you could not increase its production.</p> <p>We have concerns about the use of OVERSEER in determining a NRP as it was not designed for this purpose.</p>	
<p>Sub-catchment approach</p> <p>*3.11.4.5</p> <p>*Anywhere else in the plan that supports a sub-catchment approach</p>	<p>We support with amendments</p>	<p>Using a sub-catchment approach is the only way to ensure a fair reduction in nitrogen emission and other contaminants. The highest polluters will have the worst quality surrounding waterways and will have to make the most changes to get their waterways up to standard. The people who are already doing the right thing will be rewarded for their conservative approach, without being restricted by it in the future. In conjunction with farm environmental plans, this is the only way to achieve Objective 1 and Objective 2 concurrently.</p>
<p>Farm environment plans</p> <p>*Policy 2</p> <p>*Rules 3.11.5.1 – 3.11.5.7 inclusive</p> <p>*Rule 3.11.4.3</p> <p>*Schedule 1</p>	<p>We support with amendments</p>	<p>We believe FEPs in combination with a sub-catchment approach is the best way to achieve Objective 1. The emission of nitrogen and other contaminants should be restricted to what the land can handle rather than some arbitrary stocking level obtained during a drought.</p> <p>We are concerned that the lack of qualified FEP planners would make the timelines impossible to achieve. We are also concerned that this personnel shortage will drive the cost of getting a FEP to prohibitive levels.</p>

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
			expensive exercise again.
<p>Stock exclusion</p> <p>*Policy 3</p> <p>*Policy 4</p> <p>*Rule 3.11.5.1 – 3.11.5.4</p> <p>*Schedule C</p>	<p>We support with amendments</p>	<p>We agree that flat, intensively farmed land should have waterways fenced off. However we think FEPs should be used on sheep and beef hill country farms. The financial cost to fence the waterways and put in a water reticulation system is unachievable for us. Our local community would be crippled by the cost of implementing this policy, directly contravening Objective 2.</p> <p>We think the National Water Accord's recommendation of slopes up to 15 degrees be fenced is far more sensible and should apply to Healthy Rivers. We also seek clarification on how the slope is measured. The definition of a water body in the National Water Accord is also a much more sensible approach and should be adopted in this plan.</p> <p>We are concerned about what assurances we have with regards to future fencing and the cost to comply with new laws.</p>	<p>We would like to see this policy amended in the following ways:</p> <p>*Allow FEPs to mitigate the nutrient and sediment loss into waterbodies, instead of an overall exclusion of stock from waterways.</p> <p>*Subsidy for any fencing and water reticulation systems that are required</p> <p>*Amend slope to 15 degrees and adopt the definition of a waterbody from the National Water Accord.</p>
<p>Objective 4</p>	<p>We support with amendments</p>	<p>We support the idea of people and community resilience, but the plan will not allow for this due to the uncertainty it creates. Investments will not be made during a period of such uncertainty; businesses will not expand and communities will not prosper. This plan fails to ensure people and community resilience.</p>	<p>We seek removal of objective 4b.</p>

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
Restricting land use change *Policy 6 *Rule 3.11.5.7 *All other references to restricting land use change	We oppose this policy	This affects the value of land and prevents any future development of suitable land.	We seek removal of this policy.
Policy 16	We oppose this policy	Everybody is responsible for ensuring that we, and future generations, have healthy waterways. The rules that set out to achieve this vision should apply to everyone.	We seek removal of this policy.
Removal of the Hauraki portion of the plan	We oppose	It is unfair that there will be farmers within the catchment that are not responsible for achieving healthier and cleaner waterways. For this plan to succeed the whole catchment needs to be accountable.	We seek removal of this part of the plan.

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Yours sincerely

ngile

4/3/17



04/03/17.

Signature

Date