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 401 Grey Street Hamilton East Private bag 3038 Waikato Mail Center HAMILTON 3240

Complete the following

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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 our 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 similar submissions, I would consider presenting a joint case with them at the hearing.

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8th March 2017

Signature

date

Introduction

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

My name is David Saxton, I am a beef farmer from the North Waikato. I am submitting on this plan as it relates to my pastoral farm property on Tikotiko Road. The farm forms a small part of the Tikotiko creek's catchment and the creek flows into Lake Whangape.

This Land has been farmed by my family for around 80 Years. My grandfather developed this land as a dairy farm, my father farmed sheep there for many years and I currently finish local trade beef. These changes in management came about because of changes in the financial return from each enterprise and a desire to match the land to its most sustainable use. This flexibility and adaptability has been a significant factor in our intergenerational economic survival. Any WRC Plan Change must allow for farm management change.

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	
The Plan as a Whole Uncertainty to farm in the future	Oppose	We can all agree that the objective of the restoration and protection of our waters is a commendable undertaking but. The Plan's 80 year water quality targets are idealistic, unrealistic and will not be achieved without the cessation of farming in the catchments. If this plan became law in its current inflexible form, pastoral farming would come under increasing pressure and eventually become unsustainable. It can be seen that this drive for ever higher standards of water quality in the Waikato catchment would result in a reduction of economic activity and therefore a loss of social, economic and cultural wellbeing within our communities.	We must not allow this current plan to become law. Any Plan Change that is adopted must provide for the social and economic wellbeing of the people and the communities of the Waikato catchment. Any Plan Change that is adopted must address the other significant water quality issues that exist in the Waikato catchment. (Pest fish populations, pest bird populations, point source polluters, rubbish dump leachate, human sewage and run-off from paved areas.	

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
		I note that the plan is very restrictive on the increase of livestock populations but has no restriction on human population growth. The vast majority of human sewage in the Waikato catchment makes its way to the river, conveniently out of sight in an engineered reticulation system.	
Nitrogen Reference Point Objectives 1 and 4 Policies 2 and 7 Rules 3.11.5.2 to 3.11.5.7 Schedule B, and any other related provisions	Oppose	I oppose the grand-parenting principle that is implied by the Nitrogen Reference Point. It is demonstrably unjust as it disadvantages farms with a history of low emissions while rewarding past polluters. I oppose the use of overseer to determine NRP. It is not fit for this purpose On my property I have already retired a significant area to plantings and wetlands. I have farmed with very conservative stocking rates. This plan in its current form would remove the potential for further development and reward my environmental efforts with a low NRP therefore a reduced farm value.	Remove the use of the Nitrogen Reference Point from the plan. Remove the use of overseer from the plan.

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Walkato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
Stock Exclusion Policy 2 Rules 3.11.5.2 to 3.11.5.7 and Schedule C, and any other related provisions	l Support with amendments	Stock exclusion where it can be effective and practically achieved is likely to improve water quality. This plan change has included stock exclusion standards that are unrealistic and will never be achieved.	Financial support from Waikato Regional Council and/or Central Government for the construction of stock exclusion fencing will be required. Exclusion should only be required for permanently flowing waterbodies greater that 1m wide. Fencing must only be required where it is reasonable and practical to do so. Consideration must be made in any plan change for the ongoing maintenance of the fencing, maintenance of the waterbody its self, any planting and the control of weeds within the exclusion zone.

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	
Farm Environment Plans Policy 2, Rule 3.11.5.3, 3.11.5.4, Schedule 1	Support with amendments	I do not have a sufficient understanding of the requirements of or the cost of development of a Farm Environment Plan but the concept of developing a farm specific plan has appeal.	Any plan change could include the use of farm specific Farm Environment Plans to facilitate farm management that improves water quality. FEPs must be cost effective FEPs must be simple and practicable FEPs must be achievable	
Restricting land use change. Policy 6, Rule 3.11.5.7	l oppose this	Flexibility has always been a major advantage and a survival tool on sheep and beef properties. The ability to change stocking rate, stock class, stock species and farm inputs to suit the climatic, economic or political conditions of the day has been fundamental to farm survival. The land I farm has in the last 80 years been used for many very different economic activities. Some of these include	Remove this from the plan. Make the Farm Environment Plan the mechanism that drives water quality improvement. Each farm will have different issues to be addressed and potentially different solutions. The focus of the FEP should be on the environmental outcome not on increased bureaucratic interference in farm management.	

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
		 Dairy production, Dairy support, Wool production, Breeding and finishing lambs, Prime export Beef, Prime local trade Beef, Breeding and finishing Deer, Deer for velvet production, Field crops for export and local trade, Maize, oats, wheat and Barley for grain & fodder, Horses, Forestry, Hunting, 	
		- Tourism.	

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	
		Restricting land use change has an immediate negative impact on the property's value. More importantly for pastoral farming in the Waikato catchment all potential for further development is destroyed.		
		The Plan Change as notified will:		
		- Remove any potential for future development.		
		- Reduce flexibility of farm management.		
		- Increase compliance costs.		
		- Increase bureaucratic interference in our farming businesses.		
		- Reduce our farms economic performance.		
		- Reduce our farms economic sustainability.		
		These impacts can only serve to make farming in the Waikato increasingly unattractive to the young and innovative farmers our industry so desperately needs.		

The specific provisions my submission relates to are:	My submission is tha	it:	The decision I would like the Waikato Regional Council to make is: RELIEF SOUGHT
	SUPPORT / OPPOSE	REASON	
		This proposed plan change will fail in the significant objective of providing for the long term social, economic and cultural wellbeing of the Waikato. When the proposed plan is taken to its ultimate conclusion we may have pristine water but no Jobs.	
Policy 16	l oppose this	For this plan change to have any chance of being effective it must include all land that makes up the Waikato catchment. To exclude land because it has historically been under-capitalized is erroneous. To some extent every farm in the Waikato has been historically under-capitalized. We all could be at higher levels of production if we had had unlimited farm inputs.	Remove this policy from the plan.

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
Removal of northeastern (Hauraki) portion of plan	l oppose this	When we are asked to consider this proposed plan change we must be able to look at the subsequent effects across the entire Waikato catchment. I also farm land on Hall Road, Te Kauwhata which is now removed from PC1. This Hall Road property is farmed as one financial entity in conjunction with the Tiko tiko Road farm. Both farms are on the same NAIT number. Livestock, saved feed and farm inputs flow freely between the two blocks as management dictates. Any physical and financial records that exist are inclusive of both blocks.	The plan process must stop now. A suitably modified plan change could be re-notified when the entire Waikato catchment can be included. To consider the real long term effects of PC1 on my farming business the uncertainty around this northeastern portion of the plan must be removed.

Yours sincerely

David C. Saxton

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8th March 2017

Signature

Date