

**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
401 Grey Street
Hamilton East
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Waikato Mail Center
HAMILTON 3240

Complete the following

Full Name: Dorothy Fay Parrott and Peter Jack Parrott
Katherine Parrott and Conor Reeves Parrott

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Postal Address: 204 Hauroto Bay Road, RD1, Raglan 3295

Phone (Cell): Katherine 0276 225565

Postcode: 3295

Email: katherine@redfeather.co.nz

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.

K. Parrott 5/3/17.
Dorothy F. Parrott 5/3/17
P. J. Parrott 5/3/17

Signature **date**
Conor Reeves Parrott 5/3/17



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INTRODUCTION

Thank you for the opportunity to submit on the Waikato Regional Council's proposed Plan Change 1.

Our names are Dorothy and John Parrott, Katherine Parrott and Conor Reeves Parrott. We are three generations of a family that have been farming at Te Uku for 5 generations. We farm a mixture of sheep, beef and dairy support on our approx. 370 acre farm at Te Uku. The farm is at Hauroto Bay at the top of the Raglan Harbour, and is approximately three quarters bounded by sea.

This farm has been in our family since the early 1930s. In the last 10-15 years when it was bought from Dorothy's parents' estate by Dorothy and John, we began fencing off the foreshore and doing riparian planting. This has equated to kilometres of fencing and planting, with further plans to complete more over time. This planting has the effect of controlling erosion, preventing stock from entering the harbor and waterways and assisting the local ecosystem. Our farm has an abundance of birdlife all around it, which we take great pleasure in seeing.

We are careful not to overstock this farm, undertake careful stock management to maintain land and soil conditions, and have a nutrient plan in place so as to minimize the effects of fertilizer on land, waterways and the harbour.

A love for the land has always been central to our family's thinking. We have worked extremely hard, through many generations to hold onto our land, carefully develop it and to support our families. Our love for our farms and the drystock farming way of life is evident through the current three generations of our family. We currently have 4 separate families involved in our Te Uku farm.

Throughout our lives, we have always been members of close knit and vibrant communities of people, who care about their land and consistently do their best for it. Farming practice has changed significantly in the 70+ years that the current members of our family have been living on the land. We've always done our best to farm to current best practice, whilst holding on to our land for future generations. Developing more sustainable and environmentally considered farming practices has been a natural progression and we are committed to looking after our land in the future as best we can.

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<p>The specific provisions my submission relates to are:</p>	<p>My submission is that:</p>	<p>The decision I would like the Waikato Regional Council to make is:</p>
<p>Long Term Land Use Objectives: 1,3 and 4</p> <p>Policy 5 and 7</p> <p>Rules 3.11.5.3 to 3.11.5.5</p> <p>Schedule 1</p>	<p>I oppose</p> <p>The reasons for this are:</p> <p>This creates too much uncertainty as there is no visibility of what will be required past the 10 year timeframe of this plan. These sections raise the possibility that land may be required to go into forestry/native bush – but it doesn't say how much. This makes it impossible for farmers to effectively plan for the future and may mean significant investment made by farmers will be wasted once future plans are brought into effect.</p> <p>This part of the plan may cause significant capital devaluation of many farms – some to the point where they are uneconomic and families are forced off their land. It also means people won't be willing to invest in the improvements required, or in farms going forward.</p> <p>This plan has not considered the implications of the plan on an entire sector – the drystock farming sector. It does not take into account the impact on the drystock sector's productivity, profitability or sustainability – meaning the ability of the sector to survive in the future under this plan. Also deeply concerning is the lack of consideration of the effect on rural communities, where many of the items in this plan will pit communities against each other.</p>	<p>I seek that the provisions are:</p> <p>Deleted in their entirety; or</p> <p>As an alternative I propose</p> <p>That the plan be amended and a re-notification process begun only when there are clear indications of what land use is required on every farm in the Waikato Region with any consequential amendments arising from the submission process</p>

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<p>Nitrogen Reference Point</p> <p>Objectives: 1 and 4</p> <p>Policy 2 and 7</p> <p>Rules 3.11.5.2 to 3.11.5.7</p> <p>Schedule 1</p>	<p>I oppose The reasons for this are:</p> <ul style="list-style-type: none"> • The system being proposed is unfair • There is no ability to increase production which impacts significantly on farmers' ability to grow their businesses • Using a Nitrogen Reference Point is a form of Grandparenting – and this is not the best method for managing nutrient allocation. There are much better systems that give a more fair outcome and which allow individuals farmers the ability to be flexible in their farming business. Flexibility in farming system has always been important for drystock farmers to allow them to change farming policy based on market prices. This has been integral to their survival and will continue to be in the future. • Using Nitrogen Reference Points as the method for governing future farming practices uses an arbitrary historical method to control the future. This is not the best approach and properties/individuals should not be held to an historical measure into the future. • We are already low emitters. This method of nutrient allocation does not support, encourage or reward those who have already put positive changes in place that improve environmental outcomes. This method allows already high-emitters to continue to be high-emitters and is grossly unfair. • This is a poor nutrient allocation process • Using Nitrogen References Points (a form of grandparenting) for nutrient allocation is detrimental to communities. It would be much better to use a different, more community-led approach that allowed communities and catchments to achieve the outcomes required. Nitrogen Reference Points as an approach pits neighbor against neighbor and is greatly concerning. • This plan has not considered the implications of the plan on an entire sector – the drystock farming sector. It does not take into account the impact on the drystock sector's productivity, profitability or sustainability – meaning the ability of the sector to survive in the future under this plan. Also deeply concerning is the lack of consideration of the effect on rural communities, where many of the items in this plan will pit communities against each other. 	<p>I seek that the provision is:</p> <p>Deleted in their entirety; or</p> <p>As alternatives I propose</p> <p>That the plan is amended and re-notified only when there are clear indications of what land use is required on my farm with any consequential amendments arising from the submission process</p> <p>That a better, more fair system of nutrient allocation is developed for the Waikato Region that allows communities and catchments to develop solutions that work towards the outcomes required. At this point, the plan could be amended and re-notified once an effective system is devised with any consequential amendments arising from the submission process</p>
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<p>Stock Exclusion</p> <p>Rules 3.11.5.3 to 3.11.5.4</p>	<p>We oppose</p> <p>The reasons for this are:</p> <ul style="list-style-type: none"> • The National Water Accord recommends a different definition of a water body which we are more comfortable with. • The National Water Accord recommends that slopes up to 15 degrees be fenced, and this should apply. • The cost of fencing hill country farms is prohibitive as demonstrated by the Federated Farmers study. • In the past, cost subsidies have been available to achieve these outcomes and there is nothing in the plan to indicate that this will continue. • It is not clear from the plan what would happen in the many instances where fencing a water body was impractical, extremely difficult or likely to be damaged by naturally occurring weather events such as flooding. This plan has not considered the implications of the plan on an entire sector – the drystock farming sector. It does not take into account the impact on the drystock sector’s productivity, profitability or sustainability – meaning the ability of the sector to survive in the future under this plan. Also deeply concerning is the lack of consideration of the effect on rural communities, where many of the items in this plan will pit communities against each other. 	<p>I seek that the provision is:</p> <p>Deleted in their entirety; or</p> <p>As an alternative I propose</p> <p>That the plan is amended and re-notified only when there are clear indications of what land use is required on my farm with any consequential amendments arising from the submission process</p> <p>That the rules are changed to reflect recommendations by the National Policy Statement on Fresh Water.</p> <p>That the timelines are extended to allow better decision making with any consequential amendments arising from the submission process</p>
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<p>Restricting Land Use</p> <p>Change Pages 15 - 16</p> <p>Policy 6</p> <p>Rule 3.11.5.7</p>	<p>I oppose</p> <p>The reasons for this are:</p> <ul style="list-style-type: none"> • This devalues our land, and could impact significantly on the potential value of our land in the future. It could impact significantly on our ability to farm sustainably ie. To generate enough income to survive, and meet environmental outcomes. • We feel that this is covered by all the other rules contained in the proposed plan. • This restricts the ability of current and future generations to develop the farming business. • We don't yet know what technological advancements may be developed in the future. This prevents flexibility in the future, when technological advancements may help create the necessary changes. • It restricts our ability to react to changes in the wider environment and maintain a sustainable business. This includes changes in the market, climatic changes and the effects of adverse weather. Ultimately, it means our flexibility to farm in response to wider environmental conditions is reduced. • The rule removes our right to a choice of what happens on our own properties. We are committed to farming sustainable and good environmental outcomes, but people should have choice about how that is achieved. • This plan has not considered the implications of the plan on an entire sector – the drystock farming sector. It does not take into account the impact on the drystock sector's productivity, profitability or sustainability – meaning the ability of the sector to survive in the future under this plan. Also deeply concerning is the lack of consideration of the effect on rural communities, where many of the items in this plan will pit communities against each other. 	<p>I seek that the provisions are:</p> <p>Deleted in their entirety</p> <p>As an alternative I propose</p> <p>That the plan is amended and re-notified only when there are clear indications of what land use is required on my farm with any consequential amendments arising from the submission process</p>
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<p>Farm Environment Plan</p> <p>Pages 15-16</p> <p>Policy 2</p> <p>Rules 3.11.5.2 to 3.11.5.7</p> <p>Schedule 1</p>	<p>I oppose, The reasons for this are:</p> <ul style="list-style-type: none"> • This is too restrictive and binding. It does not allow for adverse weather conditions and any changes that may need to be made on farm as a result. These changes would require sign-off by a Certified Farm Environment Planner – an unwieldy, impractical and costly process. Farmers are very capable of responsibly making those decisions themselves. • This will discourage innovation and people trying new systems as farmers will be locked into a Farm Environment Plan. • The timing is unrealistic given how comprehensive and binding the plan is. • There is a deep concern that the costs of the requirements of this plan are unaffordable for the entire sheep and beef sector – and potentially others as well. • There is a lack of Certified Farm Environment Planners which will result in sign-off being delayed and deadlines not being met. The indicative cost of engaging a Certified Farm Environment Planner is prohibitive. • Farm Environment plans are a great idea, but they could be used much more positively as part of a more community-based approach to environmental management. They will be less effective when used in a regulatory, license-to-farm way • This plan has not considered the implications of the plan on an entire sector – the drystock farming sector. It does not take into account the impact on the drystock sector’s productivity, profitability or sustainability – meaning the ability of the sector to survive in the future under this plan. Also deeply concerning is the lack of consideration of the effect on rural communities, where many of the items in this plan will pit communities against each other. 	<p>I seek that the provisions are:</p> <p>Deleted in their entirety; or</p> <p>As an alternative I propose</p> <p>That the timeframe is extended</p> <p>That the plan is amended and re-notified only when there are clear indications of what land use is required on my farm with any consequential amendments arising from the submission process</p>
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<p>Contaminant Loss from Farm</p> <p>Objectives: 1 and 3</p> <p>Policy 1,2,4 and 7</p> <p>Rules 3.11.5.2 to 3.11.5.7</p> <p>Schedule 1</p> <p>Table 11-1</p>	<p>We oppose</p> <p>The reasons for this are:</p> <ul style="list-style-type: none"> • This plan states that the measures it proposes will not meet Objective 1 – which means the plan is fundamentally flawed and does not deliver on it's objectives. The plan offers no thinking beyond the 10 year timeframe to indicate how the 80 year water quality attribute targets will be met. This creates a state of great uncertainty, no firm foundation for people to act on in the 10 year period of this plan. • The proposed method of measuring contaminant loss from farms is built on incomplete science. The Overseer model used to measure contaminant losses has significant margins of error and does not provide a sufficiently reliable solution. This creates, error, uncertainty and potential unfairness • The effects that koi carp have needs to be included in this proposed plan • This plan has not considered the implications of the plan on an entire sector – the drystock farming sector. It does not take into account the impact on the drystock sector's productivity, profitability or sustainability – meaning the ability of the sector to survive in the future under this plan. Also deeply concerning is the lack of consideration of the effect on rural communities, where many of the items in this plan will pit communities against each other. 	<p>I seek that the provisions are:</p> <p>Deleted in their entirety</p> <p>As an alternative I propose</p> <p>That the plan is amended and re-notified only when there are clear indications of what land use is required on my farm a significant time into the future, with any consequential amendments arising from the submission process</p> <p>That the plan is amended and re-notified only when there is a better system for measuring contaminant losses from farms, with any consequential amendments arising from the submission process</p> <p>That the plan is adjusted to contain rules for the elimination of koi carp with any consequential amendments arising from the submission process</p>
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<p>Sub-catchment</p> <p>Management Policy: 9</p> <p>Implementation method: 3.11.4.1 and 3.11.4.5</p>	<p>We support in part</p> <p>The reasons for this are:</p> <ul style="list-style-type: none"> • We believe this will work very well for our area and for the Region as a whole • We support the policy but request that it be amended • This plan has not considered the implications of the plan on an entire sector – the drystock farming sector. It does not take into account the impact on the drystock sector's productivity, profitability or sustainability – meaning the ability of the sector to survive in the future under this plan. Also deeply concerning is the lack of consideration of the effect on rural communities, where many of the items in this plan will pit communities against each other. 	<p>I seek that the provision is: amended as set out below</p> <p>As an alternative I propose</p> <p>We would like allowance for a sub-catchment approach included in the rules with any consequential amendments arising from the submission process</p>
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<p>Stocking Rates</p> <p>Objectives: 1 and 3</p> <p>Policy 1,2,4, 6 and 7</p> <p>Rules 3.11.5.2 to 3.11.5.7</p> <p>Schedule 1</p> <p>Table 11-1</p>	<p>We oppose</p> <p>The reasons for this are:</p> <ul style="list-style-type: none"> • This plan gives no ability for farmers to change their stocking rates. This has the ability to cripple farmers in their businesses, as even if more environmentally sound farming practices are put in place, or technological advances allow for sustainable increases in stocking rates in the future, it will not be allowable under this plan. • This has the ability to seriously negatively impact sustainability, growth, or in many cases succession planning for many farms. • This is too restrictive and not flexible enough for all farmers • This plan has not considered the implications of the plan on an entire sector – the drystock farming sector. It does not take into account the impact on the drystock sector's productivity, profitability or sustainability – meaning the ability of the sector to survive in the future under this plan. Also deeply concerning is the lack of consideration of the effect on rural communities, where many of the items in this plan will pit communities against each other. 	<p>I seek that the provisions are:</p> <p>Deleted in their entirety</p> <p>As an alternative I propose</p> <p>That the plan is amended and re-notified only when there are clear indications of what land use is required on my farm a significant time into the future, with any consequential amendments arising from the submission process</p> <p>That the plan is amended and re-notified only when there is a better, more flexible system for measuring contaminant losses from farms, with any consequential amendments arising from the submission process</p>
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<p>Area affected by the Plan</p> <p>Objectives: 1 – 6</p> <p>Policy 1 - 17</p>	<p>We oppose</p> <p>The reasons for this are:</p> <ul style="list-style-type: none"> • With the withdrawal of a large sector of the Waikato Region and initial area covered by this plan (The Hauraki Plains) the plan is now further ill-considered and incomplete. It does not provide an effective, clear, fair pathway forward towards effectively achieving it's objectives. It now excludes a large part of the region it initially included. We need to go back to the drawing board and create a better pathway forward where all the implications on all parties affected are considered. • This plan fails to consider the impact on many groups and many aspects of their lives, communities and businesses. Most people want to work towards better environmental outcomes but this current plan has completely failed to consider many vital aspects and effects of what it proposes. • This plan has not considered the implications of the plan on an entire sector – the drystock farming sector. It does not take into account the impact on the drystock sector's productivity, profitability or sustainability – meaning the ability of the sector to survive in the future under this plan. Also deeply concerning is the lack of consideration of the effect on rural communities, where many of the items in this plan will pit communities against each other. 	<p>I seek thatthe provisions are:</p> <p>Deleted in their entirety</p> <p>As an alternative I propose</p> <p>That the plan is amended and re-notified once further thinking, research, consultation with affected parties and consideration has been give to what constitutes an effective, sustainable way forward, with any consequential amendments arising from the submission process</p>
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WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

<p>Grazing Slopes and Grazing</p> <p>Winter Forage Crops</p> <p>Objectives: 1 and 3</p> <p>Policy 1,2,4, 6 and 7</p> <p>Rules 3.11.5.2</p>	<p>We oppose</p> <p>The reasons for this are:</p> <ul style="list-style-type: none"> • A blanket ban on grazing any part of a property with a slope greater than 15 degrees immediately renders huge parts of many farming properties un-farmable. • This clearly has a massive effect on the productivity and profitability of many farming businesses – and may render many of them uneconomic • This will hugely destabilize many farming businesses, will have a huge negative effect on many farmers, families and communities • It will devalue people's farms significantly, meaning families lose the investment in their farms – which has often been made over many generations. • This plan has not considered the implications of the plan on an entire sector – the drystock farming sector. It does not take into account the impact on the drystock sector's productivity, profitability or sustainability – meaning the ability of the sector to survive in the future under this plan. Also deeply concerning is the lack of consideration of the effect on rural communities, where many of the items in this plan will pit communities against each other. • Similarly, a blanket ban on grazing winter forage crops is untenable and unnecessary. This will adversely affect the farming practice of many farmers. Done sensitively, grazing of winter forage crops can be environmentally sound 	<p>I seek that the provisions are:</p> <p>Deleted in their entirety</p> <p>As an alternative I propose</p> <p>That the plan is amended and re-notified once further thinking, research, consultation with affected parties and consideration has been give to what constitutes an effective, sustainable way forward, with any consequential amendments arising from the submission process</p>
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WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

<p>Social, Economic and Cultural Wellbeing, People and Community Resilience</p> <p>Objectives: 1, 2, 3, 4</p>	<p>We oppose</p> <p>The reasons for this are:</p> <ul style="list-style-type: none"> • This plan has a massive effect on the productivity and profitability of many farming businesses – and may render many of them uneconomic in the long term • This will hugely destabilize many farming businesses, will have a huge negative effect on many farmers, families and communities. The negative mental, financial, emotional and physical impacts of this plan will be significant • It will devalue people's farms significantly, meaning families lose the investment in their farms – which has often been made over many generations. This plan has the ability to destabilize some farming businesses so much, that it puts them out of business. Many of the requirements are impractical and unaffordable. People may lose the value of their life's work – or the work of many generations. • This plan has not considered the implications of the plan on an entire sector – the drystock farming sector. It does not take into account the impact on the drystock sector's productivity, profitability or sustainability – meaning the ability of the sector to survive in the future under this plan. Also deeply concerning is the lack of consideration of the effect on rural communities, where many of the items in this plan will pit communities against each other. • This plan detrimentally affects the social, economic and cultural wellbeing of a large group of people in this Region. It will impact negatively on communities • This plan takes a highly regulatory approach to achieving water quality. This does not build resilient communities – this creates regulated, rule and compliance-based communities, that are divided, in conflict and disempowered. In this day and age, we should be working in a more modern, collaborative and community-oriented way – organisations from primary schools to businesses are adopting far more people-driven collaborative approaches. Communities working together can achieve the outcomes that are required, but this plan does not give them the opportunity to do so – instead, it creates a rigid, inflexible, compliance-based situation where neighbours will have totally different outcomes and a lot of ensuing conflict. We can do so much better as a Region than the contents of this plan! 	<p>I seek that the provisions are:</p> <p>Deleted in their entirety</p> <p>As an alternative I propose</p> <p>That the plan is amended and re-notified once further thinking, research, consultation with affected parties and consideration has been give to what constitutes an effective, sustainable way forward, with any consequential amendments arising from the submission process</p>
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Yours sincerely

Print name KATHERINE JANE PARROTT
DOROTHY FAY PARROTT
PETER JACK PARROTT
CONOR JOHN LIVINGSTON REEVES PARROTT.

KJ Parrott 5/3/17.
Signature Date

Dorothy F Parrott 5/3/17

P.J Parrott 5/3/17

Conor Reeves Parrott 5/3/17