

**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 Council's 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

Full Name: Edward Murray Neal, Patricia Charlotte Neal

Phone (Hm): 07 -8787794

Phone (Wk): As Above

Postal Address: 927 State Highway 30, R.D. 3, Te Kuiti 3983

Phone (Cell): Nil

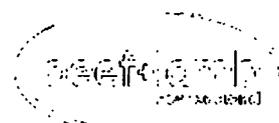
Postcode: 3983

Email: mandtneal@gmail.com

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.

Em Neal Patricia 4-3-2017
Signature **date**



WAIKATOREGIONALCOUNCILPROPOSEDWAIKATOREGIONALPLANCHANGE1-WAIKATOANDWAIPARIVERCATCHMENTS

Introduction

I Murray Neal, farmer aged 68 years (and my forebears/parents) have resided in the Puketutu District, or Waiteti Stream/Mangaokewa River catchment since 1964. Purchased the first parcel of land in 1961. This land was known as Maori Land and the sale procedure was through the Maori Land Court with the late Mr Fin. Phillips, lawyer from Otorohanga acting as our counsel. Prior to these dates we resided in the Mangaotaki Road, Piopio.

It should be noted that this land was offered to Lands and Survey Department and/or Maori Affairs, but was rejected on the grounds it was too rough and too poor for farm development.

Over time further parcels of adjoining Maori Land were purchased along with a small adjoining dairy farm in 1974 (was sold due to cessation of cream collection) and another adjoining small ex dairy farm in 1993 saw the total land holding rise to just over 1000 hectares. This was farmed under the name of Puketutu Farm Limited.

In 1981 a 400 hectare block of land in the headwaters of the Waipa River was purchased from Mr ET Buckley who had logged and clear felled a small area of bush. Government incentives available at the time encouraged the development of this land to productive pasture. These were Land Development Encouragement Loans, Livestock Incentive Schemes.

Puketutu Farm Ltd was wound up in 1996 with the land split between my brother and myself. I have the northern area of 610 hectares of the Puketutu block (Waiteti/Mangaokewa catchment) my brother has the southern area which includes Waiteti Stream and Mokau River catchments plus the upper Waipa block.

It can be seen from the brief time line above that I have been involved in land development for basically a life-time. This physical development to where we are today was done not only with contractors but also by myself and family, hands on stuff. Felling bush and crushing scrub was a job where safety and responsibility was paramount. Then followed burning, seeding and fertilizer application and fencing. In time these areas were then winter cropped (Swede, kale), regrassed into better pasture species, not bush burn mix. As a result stock numbers increased, production increased, income increased, development increased more speedily and so the cycle continued and I do hope will continue to happen.

February 2009 saw the purchase of 303 hectares of adjoining land on the northern boundary of our property. This new property also includes the Waiteti Stream, Mangaokewa River and Mahorehore Stream/River (which joins into the Mangaokewa River) running through it.

This healthy Rivers scheme/charade seems hell bent on pulling the land out from under my feet, to which I feel an affinity toward. No different to the way Maori/Iwi feel in respect to the land. I want my future generations to benefit from my hard work and sacrifices. This also includes the hard work done by my wife and children.

Overall the property has many different physical characteristics i.e. flat, medium, steep hills; three main waterways (Waiteti Stream, Mangaokewa River, Mahorehore Stream and arterial feeders); rock types include Rhyolite, Greywacke (rubble), Limestone, Mudstone (Papa), and various soil types.

These different farm characteristics determine the farming plan i.e. certain parts of the farm are restricted to sheep only because they are too steep (dangerous) for cattle. Other areas are farmed with a mixture of both sheep and cattle and are also able to be cropped for winter feed.

WAIKATOREGIONALCOUNCILPROPOSEDWAIKATOREGIONALPLANCHANGE1-WAIKATOANDWAIPARIVERCATCHMENTS

We as a couple are now at the age where we have undertaken a Succession Plan to enable the next generation to continue improving and caring for this land.

At the present moment we are in the process of implementing a farm water reticulation system. This will initially provide clean troughed water for livestock to an area of the farm previously at risk during dry summers. However the long term plan is to have reticulated water over the whole farm. The availability of troughed water/easy access, eliminates the need for them to drink from water courses. This unfortunately cannot be achieved in one year.

We oppose the plan because the plan should provide certainty for us for the future, and therefore we seek that the plan in its current form be declined.

WAIKATOREGIONALCOUNCILPROPOSED WAIKATOREGIONALPLANCHANGE1-WAIKATOANDWAIPARIVERCATCHMENTS

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.

<p>The specific provisions my submission relates to are:</p> <p>State specifically what Objective, Policy, Rule, map, glossary, or issue you are referring to.</p>	<p>My submission is that:</p> <p>State:</p> <ul style="list-style-type: none"> • whether you support, or oppose each provision listed in column 1; • brief reasons for your views. 	<p>The decision I would like the Waikato Regional Council to make is:</p> <p>Give:</p> <ul style="list-style-type: none"> • precise details of the outcomes you would like to see for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you seek
<p><i>Objective 1 – Long Term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit.</i></p>	<p>We support this objective</p>	

WAIKATOREGIONALCOUNCILPROPOSEDWAIKATOREGIONALPLANCHANGE1-WAIKATOANDWAIPARIVERCATCHMENTS

<p><i>Objective 2 – Social, economic and cultural wellbeing is maintained in the long term</i></p>	<p>We support this objective – but have concerns that the cost of implementing the requirements as proposed could result in farms being uneconomic.</p> <p>Farms will have to meet extra costs of fencing, water supply and reticulation.</p> <p>Livestock numbers may have to be reduced, and if so, income will fall, labour will be cut back, surplus dwellings will become worthless, farm values will be lower, equity will reduce, farm will no longer be able to meet its annual commitments. A forced sale may result.</p> <p>Multiply this scenario several times and you will see the closure/down-sizing of many service industries. To name a few:</p> <p>Fixed wing and aerial fertilizer spreaders Agricultural contractors (earthmovers, cropping, hay/silage) Trucking industry Local meat processing companies – Te Kuiti, Benneydale Stock and Station firms Rural retailers Veterinary clinics Banking (already happening – Otorohanga closures) Rural schooling</p> <p>Staff involved in the above businesses will become redundant/or reduced hours of work, therefore will leave the district to seek employment elsewhere. Population of small rural towns will reduce significantly, and remaining ratepayers will be forced to carry a greater financial burden.</p>	<p>Funding to assist farmers implement the requirements of the plan, or maybe Waikato Regional Council purchase areas of farm/or whole farm at a price based on valuation prior to release of Healthy Rivers Plan.</p>
--	--	--

WAIKATOREGIONALCOUNCILPROPOSEDWAIKATOREGIONALPLANCHANGE1-WAIKATOANDWAIPARIVERCATCHMENTS

<p>Objective 3 – Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and freshwater Management Unit.</p>	<p>We support this objective in principle, however our sub-catchment (Parts of Mangaokewa River, Waiteti Stream, and Mahorehore Stream) despite being a Priority 1, imposes blanket rules and requirements when there is no scientific evidence of what the water quality attributes issues are (if any) when the water ways pass through our property.</p>	<p>We seek scientific data of what our current water quality is upon entering and leaving our property. We would like to see the Waikato Regional Council place more monitor points along the rivers to identify where and when spikes in water contamination arise. As areas of contamination are identified, it would enable WRC to trace source of contamination and deal with the perpetrators. We see from plan that there is a monitoring station at Mangaokewa Stream at the Lawrence Street Bridge in Te Kuiti which is down-stream by more than 10 km from our property. It is also within the Te Kuiti town boundary and has passed by an industrial area which includes some of the following:</p> <ul style="list-style-type: none"> Meat processing plant x 2 Limeworks Transport Company depot x 2 Inframax Construction Depot Timber Sawmill Balance Fertilizer Bulk Storage depot Livestock Saleyards Stock Truck effluent disposal site And others, engineering etc. <p>There is a livestock paunch disposal site on a property along State Highway 30, close to Waiteti Stream before it adjoins the Mangaokewa River.</p>
---	--	--

WAIKATOREGIONALCOUNCILPROPOSEDWAIKATOREGIONALPLANCHANGE1-WAIKATOANDWAIPARIVERCATCHMENTS

<p>Objective 4 – People and community resilience</p>	<p>We support this objective in principle – but only when there has been scientific data produced.</p> <p>There is no certainty of what might happen in 10 years. There may be improvement, no change, or deterioration, but implementing has been at considerable cost to the farmer and the community.</p> <p>Being forced to either retire/plant forest (pine) in areas deemed too steep to graze will result in considerable expense to fence with no immediate (2-5 years) economic return.</p>	<p>Scientific data needs to be obtained for each farm.</p>
<p>Objective 5 – Mana Tangata – protecting and restoring tangata whenua values</p>	<p>We oppose this objective in part - tangata whenua have the ability to: Does ability also mean <u>right to</u>:</p> <p>Ownership of the land should not determine what rules are applicable. Should we not <u>all</u> be working towards improving water quality.</p>	<p><i>I have no objections to local Maori coming onto our property to collect water based produce e.g. eels, watercress if contacted beforehand.</i></p> <p><i>In the past I have refused commercial eeling operators because my belief is the eels are there for the locals.</i></p> <p><i>The rules should be the same for everyone otherwise it will create racial disharmony.</i></p>

WAIKATOREGIONALCOUNCILPROPOSED WAIKATOREGIONALPLANCHANGE1-WAIKATOANDWAIPARIVERCATCHMENTS

<p>Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens</p> <p>Section b – Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharge</p> <p>Section c – Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes.</p>	<p>Support policy principle of reducing discharges of nitrogen, phosphorus, sediment and microbial pathogens but have concerns regarding sections b and c of this policy.</p> <p>What determines a moderate to high level of contaminant. Each property would have to be monitored to obtain the discharge level. Who pays this cost.</p> <p>We agree with the term progressively. This means we need more time than indicated in the Plan (2023) Fencing of Mangaokewa River would result in the growth of noxious weeds such as gorse, blackberry, broom and other woody species. The spraying of such weeds would be contaminating the waterway. The Te Awaroa Trail runs beside this river and is used by a great number of tourists. Once fenced off this walkway will become impassable and dangerous to those trampers. Whose responsibility will it be to maintain this trail? Given the increasing number of trampers using the above mentioned trail, they have calls of nature, where do they do it. Beside the river, in the river, but not in my paddock please. Would the WRC consider funding and installing and maintaining Portaloos along this trail?</p>	<p><i>High contaminant properties once identified would be monitored to reduce their discharge level. This can also be achieved by effective stock management (grazing systems) to topography and seasonal variances.</i></p> <p><i>Encouragement/financial support should be given to farmers to provide reticulated water sources i.e. troughs as an alternative water source for animals. Easy access to troughs means stock would not tend to seek rivers, stream water..</i></p> <p><i>The installation of a reticulated water scheme is always subjected to malfunction i.e. loss of water to livestock. Should instances like this occur, we would like provision in a FEP to allow emergency stock access to alternative water sources (fenced waterways) until problem in repaired. If not permitted this becomes an animal welfare issue.</i></p>
---	---	---

WAIKATOREGIONALCOUNCILPROPOSEDWAIKATOREGIONALPLANCHANGE1-WAIKATOANDWAIPARIVERCATCHMENTS

<p>Healthy Rivers Plan</p> <p>I am bewildered by the complexity of this plan. The language/grammar used is confusing to the ordinary/hands on/on the land farmer. To comment on each and every Rule, Section, Clause, sub-clauses will take more time than what I have available in which to make a full submission. Our concerns are as listed previously plus:</p>	<p>Stock Exclusion Our property is in Priority 1 sub-catchment and the time frames given to exclude stock from waterways is too short. Cost to fence waterways and provide reticulated alternative water sources for our property has been estimated to be in the order of \$850,000. This figure is only for materials and installation. Does not include cost of borrowings, water crossings/bridges, ongoing maintenance and annual electricity cost for pump and fencing. There is also the cost of obtaining a Certified Farm Environment Plan , estimated to be anything from \$2,000 - \$20,000.</p> <p>Nitrogen Reference Point – Strongly disagree, as it restricts us in taking advantage of market changes. i.e. we are locked into a system. This locking in process determines the value of the property. If my NRP is high the farm value will be high, if low, value of farm is lowered.</p> <p>Farm Environment Plan- Certified Establishing and registering a plan that sets out what can and cannot be undertaken on the property,(including land use change) remains with that property. To me this is in effect a covenant attached to the legal title. In other words this is a Restraint of Trade Order, which I understand to be illegal.</p>	<p>Would it not be reasonable for Waikato Regional Council to purchase a property in Priority Catchment 1. and use it as a ‘Test Case Farm’. Implement all the Policies, measure the results, including costs, before and after to show farmers the positive/and or negative outcomes. This would show whether this Plan in it’s present format is achievable, practically and financially.</p>
---	---	---

Yours sincerely

Name (Print)

WAIKATOREGIONALCOUNCILPROPOSEDWAIKATOREGIONALPLANCHANGE1-WAIKATOANDWAIPARIVERCATCHMENTS

E.M. NEAL

P.C. NEAL

E.M. Neal

P.C. Neal

4-3-2017

Signature

Date