

**Waikato Regional Council Proposed Waikato Regional Plan Change 1
Waikato and Waipa River Catchments**

Submission on a publicly 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

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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 we are not in direct trade competition with them.

We wish to be heard in support of this submission



Geoff Tucker

5-3-17

Date



Kara Tucker

5-3-17

Date

Introduction

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

We are sheep and beef farmers in the Opuatia catchment, residing in Glen Murray. We farm 315 hectares, 128 hectares that we own and the balance is leased. The country is mainly rolling with some steeper areas. Kara works as a large animal veterinarian practising in the local community. We have two children aged 4 and 6 who attend the local school.

Of interest to us and in relation to proposed Plan Change 1 we relate a recent experience regarding water quality and the challenges we all face. In the autumn of 2016 working with a friend and Fish and Game we established and fenced off an approximately 2.5 hectare wetland area which filled with clear water. Unfortunately when the first significant winter floods came, carp invaded from the Opuatia's main stream. Frustratingly, the presence of carp in the wetland has resulted in vastly reduced water clarity.

The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following letter. 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.

Objective 1 and Table 3.11-1

We support with amendments.

We support the long term protection of our waterways and water quality. However, we are concerned that the 80 year targets set out in Table 3.11-1 may not be achievable due to the massive changes to the regions flora and fauna and the population increase during the past 150 years.

Relief sought:

Align water quality targets with the National Policy Statement on water quality. This is new ground for our region, make sure the appropriate research has been done and water quality data collected for each sub-catchment prior to making guidelines.

Lets 'look before we leap'.

Objective 2 and Objective 4

We support with amendments.

Any plan changes must have an eye to maintaining the long term economic, social and cultural viability for our rural and urban communities.

Relief sought:

Strengthen provisions protecting the long term cultural, economic and social wellbeing of our communities. Locally our community is robust and our hill country farming culture vibrant, reflective of intergenerational skills, practices and traditions.

Heavy handed, expensive and ill conceived regulation will have an enormous impact on our economic viability.

We would like to see Objective 4b deleted as it leaves individuals, families and communities in an uncertain twilight zone.

Permitted Activity Rules

Rules 3.11.5.1 and 3.11.5.2

We oppose these rules.

We seek that rules be developed permitting low intensity or low risk land uses on an ongoing basis.

Relief sought:

Delete standard 4c Rule 3.11.5.2.

Land uses with a stocking rate at or below 18 stock units per hectare (as at the 30 June in any given year) be allowed as a permitted activity. Enable stocking rate to increase or decrease whilst remaining below 18units/hectare (as proven by a Farm Environment Plan) at farmers discretion, age, stage of life etc. Flexibility in the plan encourages buy in.

We request any standards or clauses which hold land to historic discharge levels or stocking rates be deleted.

Riparian setback distances and fencing requirements be amended to apply only to land below 15 degrees of slope.

Restricted Land Use Change

Policy 6 Rule 3.11.5.7

We oppose this rule.

This rule negatively affects our land value and constricts our ability to develop our business should this be required.

Relief sought:

Delete this rule.

Sub-catchment Scale Planning

Rule 3.11.4.5

We support this implementation method with amendments.

We believe the sub-catchment management approach will lead to community buy in. Allowing identification of local problems via Farm Environment Plans and creation of practical solutions. For ex. E.coli may be a problem in one catchment but not another.

Relief sought:

Amend existing objectives, policies and implementation strategies to enable sub-catchment groups to manage their resources to achieve water quality outcomes following science based processes.

Nitrogen Management, application of the Nitrogen Reference Point and use of Overseer

Policy 2 and 7 Rules 3.11.5.2 to 3.11.5.7 (inclusive)

Schedule B and all other areas of Plan Change 1 referring to Nitrogen Reference Point

We oppose.

We oppose this grandparenting approach via the Nitrogen Reference Point. Historically low emitters are heavily penalised. Heavy emitters will have to reduce but they will still remain at levels many times that of more historically conservative farmers.

We oppose the use of Overseer (a provider of input guidelines) as a regulatory tool. Overseer's variance and recognised inaccuracies are too alarming to provide reference points. If the Waikato Regional Council seeks collaboration with farmers and communities, Nitrogen Reference Points are not the way to start.

Relief sought:

We seek that the Nitrogen Reference Point and the use of Overseer are removed from the plan entirely.

Adopt a sub-catchment approach based on Farm Environment Plans. Use of science and water testing to determine which contaminants are an issue in that catchment. Not a blanket restriction targeting one nutrient.

Stock Exclusion

Policy 3, Policy 4 Rules 3.11.5.1 to and inclusive of 3.11.5.4 and Schedule C

We support with amendments.

We support this concept in line with the National Policy Statement, defining a waterway as 1 metre wide and 300mm deep of perennial flow, requiring fencing where slopes are less than 15 degrees. We have concerns around how the slope parameters will be judged.

Relief sought:

Bring our Wai Ora Plan into line with the National Policy Statement on Fresh Water guidelines. Follow National Policy Statement on Fresh Water references to waterway definition, slope of land requiring stream fencing and stocking rate parameters.

Allow individual Farm Environment Plans to offer mitigations appropriate to that farm and sub-catchment.

Waterway fencing should be majority subsidised by the Waikato Regional Council.

Farmers operating on hill country be given time to show where their water quality presently sits via macro invertebrate counts for example. If fencing is required surety much be provided that those properties will not be forced into plantation forestry by future plan changes.

Farm Environment Plans

Policy 2 Rules 3.11.5.1 to and inclusive of 3.11.5.7 Schedule 1

We support with amendments.

We support the use of Farm Environment Plans to identify critical problem areas on farm and as a means to present management mitigations to address these problems.

Relief sought:

Farm Environment Plans should be able to be produced by the farmer or landowner with Waikato Regional Council guidance and support, this being the most cost effective option.

Amend Farm Environment Plan requirements to adopt nationally recommended standards around fencing and the upper limit of low intensity agriculture (18 stock units per hectare as at 30 June in any given year) etc.

Delete 5(a) and enable flexibility in Nitrogen emissions from low intensity sheep and beef farming.

Policy 16

We oppose this policy.

If we wish to achieve long term gains, we need everyone to be working under the same standards.

Relief sought:

Everyone held to the same standards.

Yours sincerely,  _____ 5.3.17
Geoff Tucker Date

 _____ 5-3-17
Kara Tucker Date