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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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 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.

Kelv Stokes 6-3-17

Signature **date**

beef+lamb new zealand

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Please consider forwarding a copy of your submission to B+LNZ so we can echo your comments in our submission

I am the 3rd generation farmer to own this 60 hectare block of land close to city of Hamilton. I realise this is not a large a block but as a single operator alone (not employing anyone on a permanent basis) that it is sufficient for me to manage in conjunction with a further 40 hectare block adjacent that I co-manage and work.

My family began farming in New Zealand in the 1860's in various areas from Canterbury to Northland. Much of my knowledge on how to look after the land, its pastures and the animals being farmed has been passed down to myself.

I have recently changed from dairying and beef breeding and finishing to all beef breeding and finishing. This is not the first time the farm has changed its use and or mix between the two farming types.

All supplements have been grown on the farm as required (e.g. hay, grass silage, maize silage), any additional hay or grass silage brought on to the property is only when adverse weather conditions occur e.g. summer drought. Maintaining the health of the stock is paramount.

I have done an overall costing on this plan the Regional Council wants to implement as follows:-

Initial costs
$27,000 Stock Exclusion
$15,000 Farm Environment Plan
$5,000 Nitrogen Reference Point Calculation
Total $$47,000

Annual costs
$10,000 Loss on income on land excluded by fencing
$15,000 Maintenance cost of fences, keeping the excluded land free of pests
Total $25,000

Text

Loss of Property Value
$250,000 excluded land unable to be used
$600,000 restricted land use change loss of value for resale
Total $850,000

My conclusion is this plan is constructed to reduce agriculture in the Waikato by way making farming uneconomic and forcing farmers from the land.

beef+lamb new zealand

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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 int he 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: **State specifically what Objective, Policy, Rule, map, glossary, or issue you are referring to.**	**My submission is that:** **State:** • **whether you support, or oppose each provision listed in column 1;** • **brief reasons for your views.**	**The decision I would like the Waikato Regional Council to make is:** **Give:** • **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**
Provision *Rule 3.11.5.1* *Rule 3.11.5.2* *Schedule C* *Stock Exclusion*	I ~~support~~/ oppose/ and for each whether or not you wish to amend The reasons for this are: *Why is it necessary to fence the area between 15 and 25 degrees this overtop measure is not employed by like councils. What does 25 degrees mean?* *Likewise the size of the drain to be fenced could be better defined by size e.g. (1metre wide x 30cm deep). Something that is simple for everyone to understand.* *A drain 300mm wide with a 1 metre exclusion each side invites the establishment of other pests e.g. plants and rodents. This adds further cost to the maintenance of the property. Why is stock management not being considered?* *The current document does not have reasonable implementation plan and therefore impracticable.* *Estimated initial Cost $27,000.00*	I seek that the provision is: ~~Deleted in its entirety/ Retained as proposed~~/ amended as set out below As an alternative I propose *Stock to be excluded from all drains/ streams/rivers greater than one metre wide that run continually with a fence 500mm from the edge of the bank* *Any waterway fencing should be subsidised by the Waikato Regional Council.* *Extend the time lines to give certainty that the rules will not be changed in near future and fencing previously done will not be a waste of money. That is no further land use changes to be implemented within a 30 to 40 year period*

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Provision	I ~~support~~/ oppose/ and for each whether or not you wish to amend The reasons for this are:	I seek that the provision is: ~~Deleted in its entirety/ Retained as proposed/~~ amended as set out below As an alternative I propose
Objectives 1 and 3 *Policy 5 and 7* *rules 3.11.5.3- 3.11.5.5*	*This document gives no certainty to the farmer in the long term no matter what type of farming he/she is engaged in.* *What will happen in 10 years time, will I need to change my land use e.g. put in trees, will I need to move my fences back further from drain banks.* *Past experience in the Waikato relating to wetlands has being to increase the area of a wetland when it is found to not work. That is increase an exclusion zone.* *Why have not all farms being included in the regional council under this plan and others can continue as is, and cities like Hamilton can continue under a Resource Consent to continue to discharge high levels of contaminates. There should be a single level playing field for all with no exceptions.* *The Hamilton City Council under Resource Consent has a 20 year certainty but farmers only get a 10 year one under this document.*	*To provide a detailed model for all as to the aspirations of the council and it will affect all citizens and the impacts on their activities and those of the businesses they are either employed in or manage.* *All citizens should be aware they have a part to play in "Healthy Rivers" just not a few selected farmers.* *The plan will fail if the towns and cities all not brought to account in the same time frame.*

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Provision	I ~~support~~/ oppose/ and for each whether or not you wish to amend	I seek that the provision is: ~~Deleted in its entirety/ Retained as proposed~~/ amended as set out below
Objectives 1 & 4 *Policy 2 & 7* *Rules 3.11.5.3 - 3.11.5.7* *Schedule B* *Nitrogen Reference Point*	The reasons for this are: *If you want these reference points all calculated by professionals then we need to know who is available to do them.* *What is the cost to calculate the reference point - another expense* *The system of effectively back dating the calculation of this point when farmers are in a new calendar year is totally unfair.* *Farms in development or redevelopment stage are unfairly treated.* *e.g. younger person taking over from a grandparent who had reduced certain activities on the farm so they could cope.* *This does not reward the good custodians of the land and has only looked after those that polute and continue to do so.* *There is no level playing field between the dairy farmers and the non-dairy farmers.*	As an alternative I propose *The nitrogen reference point is set aside and a system where effects based is utilised.* *Farmers should be encouraged to address actual farm problems.* *e.g. sediment run off*

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Provision	I support/ ~~oppose/~~ and for each whether or not you wish to amend	I seek that the provision is: ~~Deleted in its entirety/ Retained as proposed/~~ amended as set out below
Policy 2 *Rules 3.11.5.3 - 3.11.5.7* *Schedule 1* *Farm Enviroment Plan*	The reasons for this are: *The cost of having to employing someone with certain qualifications to do the initial plans.* *The subsequent cost of updating these plans.* *The time frame for Priority 1 persons is unreasonable.* *A system whereby farmers are deemed unable to write their own gives them no confidence in that this is workable plan.* *This section of the plan change 1 deems to create a new industry at the expense of the farmer.* *It is completely impractical.* *The information the farmer must supply to enable the council to do an audit of their farm plan seems to breach on privacy - why should the council be able to see my full set of accounts. They do not need to know if I have recently had to pay out on a marriage settlement or I have increased my mortgage.* *Estimated initial cost $15,000*	As an alternative I propose *A farm enviroment plan is supported if farmers are able to prepare these plans themselves under certain guidelines.* *Timeframes need to be revised, taking into account the overall cost of implementation of the plan on farmers, which varies depending on location and number of waterways for example on the property. Some farms will bear a much greater burden than others.*

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Provision	I support/ ~~oppose~~/ and for each whether or not you wish to amend	I seek that the provision is: ~~Deleted in its entirety/ Retained as proposed~~/ amended as set out below
Policy 6 *Rule 3.11.5.7* *Restricting Land Use Change*	The reasons for this are: *This rule allows no flexibility in the first 10 years.* *Whilst there is a provision for Resource Consent this likely to be difficult to obtain.* *There are lost opportunity costs for all types of farmers. e.g. The dairy farmer will not be able to take over grazing land adjacent to their own even if it was previously being used as part or as a whole dairy farming and even if it has continued to graze dairy heifers.* *e.g. The beef farmer cannot sell his land at the end of their farming life for a fair value when others may seek it for their type of farming.* *Plan appears to assume that all dairying is on flat land and all pastoral farming on hills and takes no account of land use history.* *Provisions made for flexibility to allow Maori owned land to be developed gives them an advantage over all other land owners. Why should this be the case?* *Because only those persons in Priority one to three areas are affected in the first ten years others outside the area will have advantages.*	As an alternative I propose *This rule needs to be deleted entirely.* *Rules should affect all farmers, all land owners not just those in priority one to three, that somehow exclude certain groups of owners.*

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Yours sincerely

Kelvin Stokes

6-3-17

Signature Date