

**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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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 do not want to be heard at the hearing.



Signature

7/3/17

date

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Introduction

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

My name is Kevin Tapp . I oppose the plan because the plan should provide certainty for me and my family into the future. There is no certainty around what I will be required to do on my property, and whether or not I will even be able to farm. I seek that the plan in its current form be declined because it does not provide certainty.

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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 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
<p>Stock Exclusion</p> <p>Schedule C Rule 3.11.51, 3.11.5.2, 3.11.5.3, 3.11.5.4, 3.11.5.6</p>	<p>I oppose all of these rules and Schedule C</p>	<ol style="list-style-type: none"> 1. Fencing of hill country is unrealistic, in particular steep hill country. Hill country is expensive to fence and you need to follow land contour, not practical as this will fence off a lot of good grazing land. 2. Water reticulation, especially on higher country is very expensive due to pumping heights. 3. The fenced off grazing land will have weeds take over that area. Blackberry thrives in those environments and the products used to control blackberry would be much more harmful than the cattle to waterways. Weed control is an ongoing expense to the land owner, and ongoing poisons entering our waterways. 	<ol style="list-style-type: none"> 1. I seek that the rules of stock exclusion be removed entirely. 2. I seek the ability to muster cattle through water body without having to develop a permitted stock crossing structure. Regulations can be included in the farm environment plans, with number/head of cattle crossing at a time, amount of times a week crossing allowed etc.

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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>Stock Exclusion (continued) Schedule C Rule 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.4, 3.11.5.6</p>		<ol style="list-style-type: none"> 4. Can't remove cattle and just run sheep on hill country. (Cattle are needed to keep pasture clean/quality pasture, particularly over the summer months). 5. Need clearer guidelines, longer time frame, flexibility in terrain that is difficult/impossible to erect fencing AND funding for farmers is required. Can't possibly afford over the short time frame provided. 	<ol style="list-style-type: none"> 3. Should be focused on reducing impacts from intensive agriculture >18su/ha rather than applying blunt and inappropriate rules to extensive agriculture. Farm environment plans to focus on addressing actual risk targeting critical source areas rather than requiring blanket stock exclusion through permanent fencing. 4. FEP's should be produced by the landowner with WRC guidance and support. Each farm is unique and needs to be assessed individually to understand if it's possible to fence or not. 5. Any waterway fencing should be subsidised by Waikato Regional Council

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Farm Environment Plan Schedule 1	Support with amendments?	<ol style="list-style-type: none"> 1. FEP are a good option with better guidelines 	<ol style="list-style-type: none"> 1. Use FEP's to determine what would work best on each farm, and science to determine which contaminants are an issue in each sub-catchment. 2. Delete Nitrogen reference point and requirements to manage to the NRP and other discharge standards 3. Delete blanket stock exclusion requirements and instead enable case by case decisions and tailored management in consultation with the land owner 4. Farm environment plans to focus on addressing actual risk targeting critical source areas rather than requiring blanket stock exclusion through permanent fencing. 5. Adopt a sub-catchment approach to contaminants that are relevant to each farm. 6. FEP's should be produced by the landowner with WRC guidance and support. Each farm is unique needs to be assessed individually to understand if it's possible to fence.

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The specific provisions my submission relates to are:	My submission is that:	The decision I would like the Waikato Regional Council to make is:
<p>Stocking Rate Cannot Increase rule 3.11.5.2.</p> <p>Nitrogen leaching grand parented to the highest annual loss rate calculated for either 2014/15 or 2015/16 and must be no greater than 15kg/n/ha/yr.</p> <p>Nitrogen Reference point is produced for the property.</p> <p>Discharge of nitrogen, phosphorus, sediment and pathogens cannot increase.</p> <p>Schedule B</p> <p>Schedule 1</p> <p>Rule 3.11.5.2</p> <p>Rule 3.11.5.3</p> <p>Rule 3.11.5.4</p>	<p align="center">Oppose</p> <ol style="list-style-type: none"> 1. Beef & Sheep systems need to be flexible to be profitable. To get capped at one stocking level will highly affect my profitability. I'm 3rd generation on this land, I've only being able to continue farming because of the flexibility I've had with running different stock classes, during differing climates and market booms/market crashes. To lose this flexibility will result in certain bankruptcy. 2. The OVERSEER system intended to be used to determine the NRP is not accurate enough. It relies on a wide number of assumptions and can vary depending on the information that is entered into it. 3. Sheep and Beef farms in general discharge the least nitrogen. The low emitters are being penalised and the polluters may continue to pollute 	<p>I seek that any provisions which restrict stocking rate or prevent increases in stocking rate be removed entirely.</p> <p>Enable flexibility in land use, discharges, and stocking rates.</p> <p>Delete any standards or clauses which hold land uses to historic discharge levels or stocking rates</p> <p>I seek that the rule of discharge of nitrogen, phosphorus, sediment, and pathogens cannot increase be removed until clear/accurate measuring of these discharges can be established.</p> <p>Adopt a sub-catchment approach to addressing contaminants that are relevant to each farm, not a blanket restriction.</p> <p>Use FEP's to determine what would-work best on each farm, and science to determine which contaminants are an issue in each sub-catchment.</p>

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(continued)	<p>4. You simply cannot cap a property based on 1-2yrs data. This is NOT an average for sheep and beef farming, particularly with the droughts experienced in recent years in North Waikato. The years chosen to determine the NRP value were drought years, thus stocking rates were very low – this will mean we are restricted to carrying lower numbers of stock (cattle in particular) going forward, with no flexibility to increase or optimise our farm systems.</p>	<p>I seek the rule Nitrogen leaching grandparented to highest annual loss rate calculated for either 2014/2015 or 2015/2016 and must be no greater than 15kg/n/ha/yr be removed entirely.</p> <p>I seek that the Nitrogen Reference Point and use of OVERSEER are removed from the plan in there entirety.</p> <p>I strongly suggest you cut back the input allowance of nitrogen applied to pasture, reduce to 10-20 units. This WILL reduce nitrogen discharge. This WILL naturally reduce stocking rate of high nitrogen emitting farms back to a reasonable/sustainable stocking rate. It's not fair or reasonable to grandparent farming enterprises that are already emitting low levels and farming at a sustainable stocking rate. The low emitters are being penalised and the polluters may continue to pollute!</p>

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
<p>Land use change.</p> <p>Rule 3.11.5.7</p>	<p>I oppose</p>	<ol style="list-style-type: none"> 1. It affects the value of my land and impedes any future ability to develop and grow my businesses. 2. It affects my ability to market my land in the future should it be suitable for dairying, and effectively removes huge amounts of equity, due to drop in value of land 3. I strongly oppose the exception of Maori owned land in this policy. The ownership of the land should have no bearing on whether the rules apply or not. The issues addressed in this plan are contaminant discharges and the rules should be the same for all regardless of ownership. 	<ol style="list-style-type: none"> 1. Deleted in its entirety. 2. Remove the exception of Maori Owned Land.
<p>Removal of northeastern (Hauraki) portion of Plan</p>	<p>I oppose</p>	<ol style="list-style-type: none"> 1. Removal of a significant section of the lower catchment from PC1 means that people are now not able to determine whether this plan will achieve its objectives and whether the costs on individuals is appropriate. 2. Withdrawal of part creates more uncertainty for those involved 	<ol style="list-style-type: none"> 1. The whole plan should be withdrawn until The Waikato Regional Council can treat the whole of its catchment as one.

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Points to consider		<ol style="list-style-type: none"> 1. I support the long-term restoration and protection of our waters. 2. I am concerned that the 80 year water quality targets may not be achievable, and possibly not even achievable under pristine conditions. 3. There are many factors contributing to the problem. Don't cripple the Sheep & Beef farmers, solely targeting one sector won't achieve the water quality targets. All Sectors need to do their bit. Waikato District Council needs to do their bit! 	<ol style="list-style-type: none"> 1. Retain the intent of Healthy Rivers but ensure that the water quality targets are achievable. 2. To achieve water quality targets, I'd like to know what is been done to reduce other pollutants. Cities, Waste treatment plants, run-off from roads, rubbish dumps etc. 3. I'd like to know what is being done to eliminate koi carp from our waterways? These are a MAJOR contributor. Around 72 million tonnes of carp can be found in the Waikato River itself. koi feeding on the bed of rivers/lakes results in huge amounts of sediment displaced. Where is the policy on cleaning up and eradicating??

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The specific provisions my submission relates to are:	My submission is that:	The decision I would like the Waikato Regional Council to make is:
		4 Too much Nitrogen is been applied to pasture. Reduce rates to be applied and work towards a total ban.

Yours sincerely Kevin Tapp


Signature

7/3/17
Date