

Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

Submission form on publicly notified – Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

SubForm	PC12016	COVER SHEET	
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		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

YOUR NAME AND CONTACT DETAILS			
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ADDRESS FOR SERVICE OF SUBMITTER			
Full name	Paul John Hunter		
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TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i>	
<input type="checkbox"/>	I could not gain an advantage in trade competition through this submission.
<input type="checkbox"/>	I am directly affected by an effect of the subject matter of the submission that:
	(a) adversely affects the environment, and
	(b) does not relate to the trade competition or the effects of trade competition.
Delete entire paragraph if you could not gain an advantage in trade competition through this submission.	

Signed:

Date:

PSH

7/3/17

SUBMISSION POINTS

I own a 220ha property on the slopes of Mangatautiri. My main enterprises are beef and maize cropping farmed over 3 properties. One of my properties is bordered by the Puniu River

I have sought to farm as sustainably as possible throughout my whole farming career. The Puniu riverbank has been fenced and planted for the last 30 years and all streams entering the Puniu through my property have had stock excluded. During wet soil conditions I have sought to stand animals off. I practice minimum till systems in growing my maize.

In the future as technology improves, I plan to move into more strip tillage and possible no till for growing my maize. I will also continue to plant non productive pasture areas in natives. I currently employ an agronomist/ soil consultant to ensure I don't have a system which is sustainable in all ways possible

I am particularly concerned about the following aspects of Plan Change 1. They all have concerning implications for my property, my current farm business and the economic wellbeing of the Waikato region.

- The significant negative effect on rural communities,
- The broad brush approach which doesn't differentiate between sub-catchments with low levels of environmental damage and those with high,
- The lack of science and monitoring at a sub-catchment level, to identify areas of priority for environmental improvement,
- The cost and practicality of implementing the rules,
- The rules around land change which will restrict the ability to take up market opportunities and restrict the region's economy,
- The cost and practicality of developing a nitrogen reference point,
- The timeframes for complying with the nitrogen reference point rules which are too short, given that OVERSEER is still being developed for the cropping sector,
- The effect that the nitrogen reference point will have on my business, the value of my land and my economic well-being,
- The costs, both cash and loss of opportunity, and the practicality of the rules for stock exclusion, cultivation and setback width,
- The cost of developing and implementing a farm environment plan, leading to the unnecessary and the costly regulation of my farm business,
- The specificity of the rules around cultivation and set-back widths

I set out my concerns more specifically in the table below.

Page No	Reference (e.g Policy or Rule number)	Support or Oppose	Decision sought Say what changes to Plan Change 1 you would like.	Reasons
45	Rule 3.11.5.7 Non-complying activity rule – Land Use change	OPPOSE	<p>Remove this rule: Replace it with a rule that enables land-use change to occur with reference to established sub-catchment limits.</p> <p>Land-use change for farming activities with contaminant losses below the catchment limit is a permitted activity so long as contaminant losses do not exceed the sub-catchment limit.</p> <p>Land-use changes for farming activities with contaminant losses above the sub-catchment limit is a consented activity.</p>	<p>I am concerned that this rule is not practical because:</p> <ol style="list-style-type: none"> 1. It is too heavy-handed to apply a land-change rule to the whole region. A more flexible approach which acknowledges differences between sub-catchments will prevent unnecessary cost and aggravation for both famers and the council. 2. The rule as it is written prevents farmers from being able to capitalise on market opportunities in a timely manner. Opportunities could be lost because of the requirement and costs associated with the preparation and approval of consents for land use change. 3. Farm profitability will be constrained by the consent processes and the economic resilience of the region will decrease. 4. The rule disregards the fact that many farmers lease land, some on a short term basis. As the leases change, so will the land-use and it will be difficult to establish whether land use intensification has occurred.
47	Schedule B Nitrogen Reference Point	OPPOSE in part	<p>I submit that the time frames for the development of NRPs for mixed arable systems is extended until the development work for the OVERSEER crop module is completed.</p> <p>And</p> <p>that the rule be redeveloped to address the inequities that high and low NRP</p>	<p>I am concerned about the level of accuracy in the calculation of NRP because:</p> <ol style="list-style-type: none"> 1. OVERSEER is not routinely used by the cropping sector. Most arable farmers have had no prior experience with OVERSEER budgets and many certified nutrient managers have had limited experience with modelling arable systems with both crops and stock. 2. The Foundation for Arable Research, completed an independent review of OVERSEER in 2013. (https://www.far.org.nz/research/environment/overseer_review).

		<p>numbers will have on land values.</p> <p>I propose as a fairer approach; Waikato Regional Council develops sub-catchment limits based on the scientific measurement and monitoring of contaminant levels within the sub-catchment waterways:</p> <p>Farms in the catchment with NRPs greater than the sub-catchment limit must endeavour to reduce their contaminant losses over time.</p> <p>Farms in the catchment with NRPs below the sub-catchment limit may continue any farming activity as long as their contaminant losses do not exceed the set limit as measured by annual nutrient budgets.</p>	<p>The panel of experts found that OVERSEER® is currently the best tool available for estimating long term, average nitrate leaching losses from the root zone across the diversity and complexity of farming systems in New Zealand, but that further work on the cropping model is needed to enhance confidence in the OVERSEER® estimates of nitrate leaching from arable farms. A subsequent work programme validating the nutrient loss numbers from OVERSEER with APSIM has been completed. Recommendations from these pieces of work have not yet been implemented into the OVERSEER crop module</p> <p>3. Attempts to model cropping systems in OVERSEER often deliver error messages preventing the nutrient reports from running. A number of “work-arounds” have been recommended by OVERSEER Ltd to manage these error messages. This moves the modelled data away from the actual farm data, increases the time and cost to prepare an OVERSEER budget and reduces the level of confidence that the farmer has in the nutrient budget.</p> <p>4. Nitrogen loss numbers from OVERSEER with a low level of confidence are good to provide a rough estimation of the farm nitrogen loss but they should not be used to develop NRPs for compliance.</p> <p>Through long term best management practices, I have been able to farm effectively with little impact on the environment. I am concerned that the low NRP number I have achieved for my property will impact negatively on my land value whereas a farm down the road with a current high NRP will be rewarded on the land-value of my farm, the so-called “grand-parenting” effect.</p> <p>If the Waikato Regional Council develops sub-catchment limits based on the scientific measurement and monitoring of contaminant levels within the sub-catchment waterways, farmers and communities can develop targeted approaches to reducing contaminant levels. The focus is then on those catchments with</p>
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51	<p>Schedule 1 Requirements for farm environment plans</p>	<p>OPPOSE in part</p>	<p>Amend Schedule 1</p> <p>I support the requirement that a Farm Environment Plan shall be certified as meeting the requirements of Schedule A.</p> <p>As an addition to the Schedule 1, I submit that farmers should be able to develop their own plans, either on their own accord or as participants in FEP development workshops.</p> <p>Certification of the FEP can be achieved by having the plan reviewed by a Certified Farm Environment Planner. The review will include a farm visit and an assessment of the identified environmental risks for contaminant losses and the mitigation plan for these risks.</p>	<p>I support the requirement for farm environment plans, they provide an opportunity for farmers to understand the environmental risks on their farms and to develop mitigation strategies to reduce the impact of their farming activities on the environment.</p> <p>If farmers develop their own plans, consistency with the Schedule 1 can be achieved by a certification process whereby the plan is reviewed by a Certified Farm Environment Planner, and the review includes a farm visit and an assessment of the identified environmental risks for contaminant losses and the mitigation plan for these risks.</p> <p>The reasons for this additional provision is to:</p> <ol style="list-style-type: none"> 1. Reduce the cost of plan development. Consistency in the quality of the plans will be maintained by the review process. 2. Reduce the level of dependence and likely pressure on Certified Farm Environmental planners for plan development.

52	Schedule 1- Point (f)(i) A description of cultivation management.	OPPOSE in part	<p>I submit that Point (f)(i) is removed from Schedule 1.</p> <p>and point f is re-worded to read:</p> <p>(f) A description of cultivation management, including: How the adverse effects of cultivation will be mitigated through appropriate erosion and sediment controls for each paddock that will be cultivated including by:</p> <p>Points (a), (b), (c) and (d)</p> <p>Points (e) and (f) do not apply to the risks associated with cultivation. I submit that these points are renumbered and removed from the cultivation clause.</p>	<p>I accept that sediment movement from cultivated land is an environmental risk. Soil losses also have a direct economic cost to the farm, however a rule preventing cultivation on slopes exceeding 15° is impractical because:</p> <ol style="list-style-type: none"> 1. The risk of contaminating water ways with sediments is more strongly related to the distance between the cultivated land and the receiving waterway than the slope of the land. In many instances sediments moving from cultivated land will not directly affect waterways. 2. When considering the environmental risks associated with cultivation the farmer and the environmental consultant must consider the following characteristics of the cultivated land: slope, proximity to receiving water bodies, overland flows (point a), measures to divert overland flows (point b) and ways to trap sediment (point c). Only if there is a high risk of contaminants getting into waterways and no practical means of stopping them, should cultivation be avoided. This can be addressed in individual farm environment plans. 3. The measurement of slope by farmers and consultants is difficult as slope is not consistent within the landscape. Within a paddock, slope will vary, and if the rule is to be upheld there will parts of the paddock which will need be left uncultivated. This poses a number of costs and management problems to the farmer, including: <ul style="list-style-type: none"> • The lost opportunity cost of land taken out of production. • The requirement to find an alternative productive and efficient use for the land. 4. Implementation and enforcement of this rule will require detailed slope information such as LIDAR, for every Waikato farm. Will WRC be able to supply this information to all farmers?
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<p>51</p>	<p>Schedule 1-Points 2(b)(iii) and 2.(f)(ii)(d)-Setback Width</p>	<p>OPPOSE in part</p>	<p>I submit that: points 2(b)(iii) and 2(f)(ii)(d) in Schedule 1 should be re-worded to read;</p> <p>2(b)(iii) - The provision of cultivation setbacks is designed to mitigate the environmental risk of contaminant losses.</p> <p>2(f)(ii)(d) - maintaining appropriate buffers between cultivated areas and water bodies.</p>	<p>A defined width for the setback of a minimum 5m is too prescriptive and will lead to a direct cost to the farm from the lost opportunity of land taken out of production and the ongoing maintenance of managing the vegetation in the set-back.</p> <p>Setbacks are important to reduce the risk of contaminants entering waterways but width should not prescribed in the rules. The design of setbacks to filter contaminants depends on a number of physical characteristics such as slope, soil type, overland flow paths and cultivation frequency and intensity.</p> <p>Effective setback design draws on proven scientific and engineering information, not regional rules.</p> <p>Environmental consultants developing mitigations in the farm plan process must design setbacks that are acceptable to the farmer. Setback width must be based on proven scientific evidence and must be the minimum width to effectively filter contaminants. Setbacks that are too wide have an ongoing economic loss for the farm relating to the area of land removed from production and costs associated with weed and riparian plant control.</p> <p>In the report to Waikato Federated Farmers Farm Environment plan project, with reference to farm 5, the opportunity cost from lost production from the development and maintenance of 5-metre buffer zones separating the drains from the crops was estimated to be \$100,000.</p> <p>On this farm the topography is flat and the farmer felt the width of setbacks was excessive given that the risk of sediment movement into the drain was low and the risk period for sediment losses between cultivation and significant crop cover was 1 month for spring and autumn sown crops.</p>
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From: Paul Hunter
To: [Healthy Rivers](#)
Subject: (MERGE with 10089537 do not need to print) Re: Healthy Rivers Plan Change 1 Submission 10089537
Date: Sunday, 2 April 2017 6:28:46 p.m.

Hi , No I do not need to speak , it is all clear in my submission. Yes to the joint case .
Regards Paul Hunter

From: Healthy Rivers
Sent: Friday, March 31, 2017 2:50 PM
To: 'pjrjhunter@xtra.co.nz'
Subject: Healthy Rivers Plan Change 1 Submission 10089537

Hi there,

Thank you for your submission, it has been received. I just require answers to a few questions in order for your submission to be considered complete, this is a requirement under the Resource Management Act.

- Do you wish to speak at the hearing in support of your submission?
- If others make a similar submission, would you consider presenting a joint case with them at the hearing?

Once this information has been received your submission will be processed.

After all submissions have been collated, you will then be sent a formal letter acknowledging receipt of your submissions. This letter will contain further information about the next steps in the submission process including information about hearings dates.

Kind regards,
Danica

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