

PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 WAIKATO AND WAIPĀ RIVER CATCHMENTS



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

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

SubForm	PC12016	COVER SHEET	
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		Submission Number	
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SUBMISSIONS CAN BE

Mailed to	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
Delivered to	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
Faxed to	(07) 859 0998 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
Emailed to	healthyivers@waikatoregion.govt.nz <i>Please Note: Submissions received by email must contain full contact details.</i>
Online at	www.waikatoregion.govt.nz/healthyivers

We need to receive your submission by 5pm, 8 March 2017.

YOUR NAME AND CONTACT DETAILS

Full name: ROGER MICHAEL RUSSELL
 Full address: 1937 HETHERINGTON RD, RD2, HUNTLY
 Email: rogerr4b@gmail.com
 Phone: 07 826 6750 Fax: _____

ADDRESS FOR SERVICE OF SUBMITTER

Full name: _____
 Address for service of person making submission: _____
AS ABOVE.
 Email: _____
 Phone: _____ Fax: _____

TRADE COMPETITION AND ADVERSE EFFECTS

- I could / could not gain an advantage in trade competition through this submission.
- I am / am not directly affected by an effect of the subject matter of the submission that:
- (a) adversely effects 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.

PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

- I wish to speak at the hearing in support of my submissions.
 I do not wish to speak at the hearing in support of my submissions.

JOINT SUBMISSIONS

- If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

- Yes, I have attached extra sheets. No, I have not attached extra sheets.

SIGNATURE OF SUBMITTER

Signature: 

Date: 8.3.2017 .

Personal information is used for the administration of the submission process and will be made public. All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal information.

PLEASE CHECK that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

1. We lease a 250ha drystock property farming dairy heifers and bulls. We are located in the upper catchment headwater west of Whangape in Plan change 1 – Priority 1 area 16. We have been on the property for 17 years, have an excellent working relationship with the owners and would be pleased to think that we may still be here in another 17 years.

We are passionate about our animals and the land and get immense satisfaction from making improvements to the property, whether it be planting shelter belts for building areas, lining tracks and races with different kinds of flora and fauna or fencing off useless swamp land and putting them into natives or something attractive like that.

The property has been subdivided into 2-2.5ha paddocks and water is reticulated to every part of the farm. This allows us to run 4300 stock units through spring, summer and autumn, dropping down to around 3500 su. through winter. We have two streams that run through the farm and have fenced off one side of the larger stream which, combined with the fact that every paddock has a trough in it, has substantially curtailed the presence of livestock in the waterways. In the future we would like to see more trees planted for stock shelter and shade which, if planted away from waterways, will further draw stock away from those waterways.

It is an unfortunate fact that we do need guiding bodies to help keep our communities and lands in order. However, a well run and managed governance body understands the importance and advantages of steering a community in the right direction without imposing intrusive, expensive and time consuming rules and requirements onto its constituents, which usually only leads to unnecessary discontentment in that society.

I believe that the intrusive dictatorial manner in which this Healthy Rivers document has been constructed is a fantastic example of how our bureaucrats have simply put into place a myriad of rules that farmers must adhere to, regardless of the fact that there is a lack of solid scientific evidence demonstrating the real benefits of many aspects of this plan. Most honest hard working people and especially farmers are usually more than happy to get behind initiatives that can show real benefits, particularly when they are win win, however when its difficult to see how any appreciable benefit can be got then we struggle to get enthusiastic. Unfortunately this is one of those times where it is hard to find the benefits. I 100% agree that we must look after our lands and waterways carefully and applaude the need for a targeted approach to forming objectives that will help us to maintain our beautiful land, but as this plan stands at the moment I believe that it will be unnecessarily burdensome in terms of time and financial cost, not only to farmers, but to the wider community.

I fully support the submission that has been lodged by Federated Farmers and am particularly concerned about:

- The significant negative effect on rural communities
- The cost and practicality of the rules
- The effect that the nitrogen reference point will have on my business and economic well being
- The farm environment plan requirements leading to unnecessary and costly regulation of inputs, outputs, normal farming activity and business information
- The costs and practicality of the rules and requirements for stock exclusion, the nitrogen reference point and the farm environment plan
- The timeframes for complying with the Nitrogen Reference Point rules which are too short and unachievable
- The plan significantly exceeding 10 year targets in many attributes and areas
- The lack of science and monitoring at sub catchment level

I am concerned about the implications all of this will have for my property and for my current activity as described above.

The table below outlines some of my concerns.

Page No.	Reference	Support or Oppose	Decision sought	Reasons
	3.11.5.2.2 Schedule C Exclusion Fencing	Oppose	Amend	Unpractical and not enough evidence to show what the benefit would be. Costs would be prohibitive especially in steep or rugged country. Flexibility required by council.
	3.11.5.2.4a & b N reference point	Oppose	Amend	Unnecessary as most drystock farmers don't use a lot of N especially farm wide. Dairy is different. Just a rule with a workable N cap would be sufficient, if someone wants to use more than that then maybe some permits could be available. No research done in our area or nearby to support the 15kg diffuse discharge limit. Not appropriate to create limits until you know what you're talking about.
	.4c	Oppose	Delete	Where is the science that demonstrates the actual effects of farming on

	No cultivation and grazing over 15 degrees			the various different contours and slopes in our area? What negative effects are showing up in the river as a result of farmers farming on the hill country? This rule will bring more unnecessary cost both in time and money to hill country farmers.
	.4d No grazing in situ	Oppose	Delete	Where is the science that demonstrates the actual effects of in situ grazing on water quality in the streams in our area. The streams are all within the councils 80 year targets in area 16
	.5 Feed fert & stock numbers	Oppose	Delete	Unnecessary – Try sharing that sort of information with statistics NZ Rather than wasting farmers time if you want it.
41	3.11.5.3			
	.1 Registration	Oppose	Delete	Adds cost, and provides no benefit to the waterways. The way forward is not to burden farmers with extra administrative workloads because they cost time and money which could actually be used to bring tangible benefits to the environment.
	.2 N reference point	Oppose	Delete	Same as 3.11.5.2.4a and see notes on schedule B below
	.3 Stock exclusion	Oppose	Amend	Same as 3.11.5.2.2 and see notes on schedule C below
42	3.11.5.4			
	.4 Registration	Oppose	Delete	See notes on schedule C below
	.5 N reference point	Oppose	Amend	Same as 3.11.5.2.4a and see notes on schedule B below
	.5a FEP	Oppose	Amend	See notes on schedule 1 below
	5b Registration	Oppose	Delete	See notes on schedule A below
	5c	Oppose	Amend	Same as 3.11.5.2.4a and see notes on schedule B below

	N reference point			
	5d Stock exclusion	Oppose	Amend	Same as 3.11.5.2.4a and see notes on schedule C below
	3.11.5.7	Oppose	Amend	Reduce our ability to respond to market and climatic and technological changes. Business viability will be threatened over time by our inability to respond to change. Punitive and controlling.

46	Schedule A Registration	Oppose	Delete	Adds burden to landowners and land users Creates a whole new sector within council that needs to be funded and will be done at landowners expense. If council wants the information it seeks in this schedule then why not just go to statistics NZ because we give them most of what schedule A requires regularly.
47	Schedule B N reference point	Oppose	Amend	N levels in Area 16 around Whangape are at 80 year levels now as they are in a good number of other waterways (35 out of 50 by my counting). Farmers in these areas should be left to continue as they are. Sub catchments could be the way forward here. These waterways could continue to be monitored and if there is an upward trend in N levels then something may have to be done. Overseer is widely recognised as inappropriate for this type of assessment, a program specifically designed for this type of work needs to be developed and fully tested before being implemented.
48	Schedule C Stock Exclusion	Oppose	Amend	These measures are too heavy handed and are likely to create issues that I don't think the CSG has foreseen. There have been a number of occasions where areas surrounding streams that have been fenced off and planted out, have been uprooted and carried away by flooding. Just the fencing off of streams means that, over time all kinds of vegetation and larger plants such as gorse, manuka, kanuka, and larger trees will grow and as they do they will restrict the streams ability to let the water

				<p>flow. On our property we have one stream that is about 2.5km long. It travels through a valley that is about 100 meters wide for about a third of its way through our farm. Currently it is fenced on one side and that greatly reduces the amount of access that stock have into the stream but it does allow the waterway to be kept clear which it needs to be because when it floods the torrent of water that flows down that narrow valley is amazingly powerful and takes anything that is standing with it. We cant reasonably be expected to continually re fence these kinds of areas. In some cases the contour of the land doesn't allow for fencing to occur. In the case of drystock farming, the amount of effect on the streams and rivers is not as great as some other farm uses and so maybe the measures imposed on us should be a little looser to allow for the difficulties that we sometimes face.</p> <p>Coy Carp are a major problem in our waterways. If they were eliminated then the areas that they inhabit would quickly return to pristine condition, as they used to be not so long ago. This should be looked into before wasting resources on exclusion zones.</p>
51	Schedule 1 (FEP)	Oppose	Amend	<p>The FEP proposal is going to add significant costs both in time and money to this business. Firstly the extra administration required to process the mountain of paperwork at council level will be burdensome and be passed onto the farmers. Then the cost of policing every aspect of every farmers plan will be huge and passed onto farmers. Then the admin costs at farm level especially in the use of consultants and time will be significant. Then there is the cost of the exclusion fencing. Then there is the cost of lost production in those excluded areas. Then there is the cost of lost production on sloped areas that cant be cultivated.</p> <p>These are hugely significant costs and I don't think council realise what a burden they are placing on a few individuals. The actual benefit that will be gained from farmers conforming with this proposal has not been satisfactorily quantified, there are too many conflicting reports regarding water quality and the real effects of exclusion fencing, and not</p>

			<p>to mention the unsuitability of Overseer for this purpose.</p> <p>Before we can move forward we need to address all of these issues. Anyone reading Shedule 1 would think that we were trying to clean up the slums of Bombay but this simply is not true. I am in area 16 and apart from the clarity in the water, all the other measures are already at 80 year levels. Coy Carp are the reason for the poor quality of our streams, especially the clarity, and this fact stands out clearly when one observes the streams with the Carp in them and then the ones without Carp in them. Residence of this area could take any unbelieving souls to some waterfalls and show them the quality of the water below the waterfall versus the quality of the water above it where the Carp are unable to go.</p> <p>No great expense would be required to make these kinds of observations and farmers would love to get behind any well organised initiative to get rid of them. At that point all the water in our area would be pristine (according to the councils own data). If council wanted to they could, at that point run a voluntary scheme for farmers to join that might look similar to this FEP. If it was well organised and ambitious, but not overly ambitious, then I'm sure it would be popular as many farmers do care greatly about their environment.</p> <p>So to summarise:</p> <ol style="list-style-type: none">1 Put this FEP on hold (at least in some sub catchments(certainly area 16))2 Rectify the issues (eg coy carp in area 16)3 When the issues are rectified and if the water is clean then possibly some kind of voluntary schemes could be put in place and incentives to join in order to keep our rivers and lovely lands beautiful.
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Conclusion

Most reasonable folk would acknowledge the need for some focus to be placed on how we look after our environment.

On the whole, and despite what some of the nay sayers are proclaiming, most of our waterways are in pretty good shape. A balanced and intelligent approach to improving the parts that need work over the next few decades will undoubtedly leave our waterways in good health for the next generations whilst also leaving our farming industry, not just intact, but in good health too. Farming has come through some very interesting times over the last few decades, with fertiliser technology being one important aspect that has, possibly, the most potential to affect the health of not just our waterways, but the soil and our food. Farmers are beginning to move to the use of more bio friendly fertilisers as they grow in their understanding of the benefits. The evidence of this can be seen by the fact that most of the big fert companies have identified demand for these more bio friendly fertilisers, and are now moving toward supplying some of these products. Farmers will move to the use of these better products and implement better systems farm wide as their understanding of the effects of these changes grows. These things take time, our (humanity) understanding of the things of nature is still in its infancy, and it wouldn't be prudent to rush head long into making rash changes that have the potential to undermine the viability of entire industries based on the limited knowledge that we sometimes have. We must also be very careful to properly consider the outcomes of the things that we are researching. It can be quite bewildering at times when various parties in the scientific community offer differing views or answers or results on the same matter. This may sometimes be as a result of our lack of understanding of all the elements that are involved in a matter, or it may be that if we disseminate the information in certain ways, we can gain the answers that we need to push a case that we feel needs to be pushed. I think it's clear that farmers are reluctantly playing piggy in the middle in both of these occasions, so it's no wonder that we are reluctant to commit our livelihoods to this proposal, which, if it goes ahead, is what we will be doing.

This proposal needs to be broken up into the subcatchments that are already in place and the issues that are prevalent in those areas should be addressed.

Overseer is not fit for purpose. It was never designed for this kind of use, even the people that made it testify to that.

Overwhelming need to simplify the administrative aspect of this proposal. Bureaucracy seems to be taking it to the limit on this one.

Also wondering about the make up of the CSG. With farmers being the most affected group and a major stake holder in this proposal one could be forgiven for wondering why only 3 of the 24 members are farmers. Is this usual? Do we need to remedy this imbalance before we can proceed?