

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.

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

SubForm	PC12016	COVER SHEET	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

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	healthyrivers@waikatoregion.govt.nz <i>Please Note: Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.</i>
Online at	www.waikatoregion.govt.nz/healthyrivers
We need to receive your submission by 5pm, 8 March 2017.	

YOUR NAME AND CONTACT DETAILS			
Full name	Te Whenua o Matata Ltd		
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		Fax	

ADDRESS FOR SERVICE OF SUBMITTER			
Full name	Mary-Ann Mathis		
Address for service of person making submission	as above		
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TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i>
/ X <input type="checkbox"/> I could not gain an advantage in trade competition through this submission.

SUBMISSION POINTS: General comments

I own a 177 ha dairy farm in the Upper Waikato Catchment, Karapiro subcatchment, currently milking about 370 cows. We have owned the farm since 2013. Two families reside and work on the farm.

The farm is operated as a conventional spring calving farm. About 40 ha is an older small farm with 130 hectares of forestry conversion added in 2007. The farm requires a lot of development work. It is rolling country and has required cropping and regrassing as part of its development. As part of the process of development, we grow forage crops. As a recently purchased property, it has a high debt level.

It also has the Greyhound Wetland of 14 ha. which is the second most significant wetland in the South Waikato. (see attached, Appendix 1) This has been a major focus of the farm with combined action from the farm, Environment Waikato and Fonterra. With a Grass Roots funding of \$2863 more native trees have been purchased and planted with release work done since in conjunction with the South Waikato District Council. We have also worked to continue to remove blackberry, possums, wild cats and stoats from the area. We have been working since with Council staff to develop a more robust plan to control the spread of grey willow, wildling pine and now poplar trees in the wetland. To date we have not put a monetary cost on this work for the farm but it has been considerable, especially in time. The wetland contains the fernbird so blanket spraying is not favoured and any other method is too piecemeal in funding to get control back. The property carries a high debt level so additional costs as proposed in the Proposed Regional Plan Change 1 for environmental compliance are of grave concern. We are already working with all our resources to improve the environment we have and link as much with outside agencies as we are able to ensure this wetland is improved. (see Appendix 2- photo of farm and Greyhound Wetland with planting)

Grey willow is of concern in other parts of the farm and is a problem we have been trying to combat as it has a serious effect on the environment, blocking waterways causing silting, flooding and weed infestation.

Our Nitrogen leaching level dropped in the past two years from 72 kg/ha/year to 50 kg/ha/year largely as a response to having a more favourable weather situation. The Nitrogen conversion efficiency rose from 21% to 34% according to Fonterra's Overseer modelling. Soil tests are done biennially and fertiliser applied as recommended.

In developing the property since its purchase, we have built a new dairy with a focus on water management to work well within the consent we have. We have also extended the effluent system and spent \$41359 on a new pond to make full use of effluent and roof water.

We have an on-going tree planting programme growing many of our own trees and have planted areas subject to pugging in more robust pasture to minimise this. We have also worked with DairyNZ and AgFirst to develop a Sustainable Milk Plan.

The stocking rate of the farm has slowly increased as development occurs but has been constrained by several years of drought and a low milk payment response to reduce costs. This is not sustainable financially and we intend to increase the stocking rate to about 400 cows. Tying the farm to 2014-6 makes it impossible to develop the farm to its productive potential and will devalue the property.

In the future, I plan to continue to develop this farm using changes in technology and management practices to ensure the farm size remains viable. It is intended to retain the farm for the benefit of our extended family. In order to continue to farm this land we need surety in consents and the rules imposed for a long period of time. We need to have flexibility in such things as stocking rates, growing crops for stock feed or sourcing outside feed when needed in order to cope with market demands and the vagaries of different seasons.

I am concerned about the following issues with PC1

- Timing of stocking rate limits. If either 2014-15 or 2015-16 are used these dates are not a fair representation of the long-term stocking of this property due to weather, market return, stock health issues and mating performance over those times or land development progress. I believe a fairer method to determine stocking rate would be a five year rolling average. There needs to be some flexibility to determine this level not to randomly pick two years. This farm would be particularly disadvantaged should the current proposal be accepted.
- Imposing extra costs on the property in terms of monitoring and reporting will affect our ability to be sustainable. For example, our current practice of soil tests biennially is effective as soil tests change very little over time. Being required to employ approved consultants will add another level of costly bureaucracy. We already gather much of the information required through Fonterra and this would be more realistic in practice.
- Setting N reference points and demanding a marked improvement over time is counterproductive when the property is already aiming to meet the standards required by Fonterra while still developing. A carrot and stick approach has always proven to be less successful in creating the changes desired than other methods.
- Setting a level for cultivation at 15° slope is impractical in rolling country.
- Demanding 5 wire fencing along waterways is expensive and impractical in terms of controlling weeds along the streambank. A better approach would be to follow the lead of the Dairy Accord with two wire fencing and its definition of what constitutes a waterway.
- Setting levels expected for improvement across the board is unrealistic. The property may already be performing well and so has less scope to show major change or it may be affected by other land users in the area such as the case with our proximity to the Kinleith mill.
- There needs to be a consistent policy platform across all contributors including the urban area.

I support the submission that has been lodged by Federated Farmers. I am particularly concerned about the following aspects of Plan Change 1:

- 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 my economic wellbeing.
- 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 the 10 year targets in many attributes and areas
- The lack of science and monitoring at the sub catchments level

I am concerned about the implications all of this will have for my property and for my current activity as described above. I set out my concerns more specifically in the table below.

SUBMISSION POINTS: Specific comments

Page No	Reference (e.g. Policy, or Rule number)	Support or Oppose	Decision sought Say what changes to Plan Change 1 you would like	Give Reasons
40	Rule 3.11.5.2 Permitted Activity Rule – Other farming activities			
41	Rule 3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	OPPOSE	<p>Amend 3.11.5.3 as requested by Federated Farmers in their submission.</p> <p>Combine FEP with current requirements of Fonterra to stop duplication of bureaucracy costs. FEP accepted on merit- may be drawn up by number of people including farmer</p> <p>Make dates for FEP acceptance longer to allow time to research and verify</p> <p>Give flexibility to N reduction- too restrictive</p>	<p>This proposal will impose significant costs on my farming activities including</p> <p>The tight timeframe to collect and verify data, especially if FEP needs to be modified</p> <p>Needs to be flexibility with Overseer- it is a model only. Needs to allow for adverse weather events, major market issues etc.</p> <p>Having only registered FEP experts creates a climate for price hiking.</p> <p>Time needs to be allowed to meet N leaching limits- better to create a process of improvement over time which most farmers try to do anyway than imposing arbitrary levels which may be impossible or uneconomic to meet especially in this area where many farms are still in an early development phase.</p> <p>The ability for Environment Waikato to make an ad hoc change to the model is also of concern.</p> <p>I am also concerned that this is not practical because we need certainty to be able to invest in the changes imposed on us and some flexibility to cope with weather events and other events such as stock health</p>

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				issues. We need to be able to develop plans to accommodate new demands.
42	Rule 3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	OPPOSE	Amend 3.11.5.4 as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including The tight timeframe to collect and verify data, especially if FEP needs to be modified</p> <p>Needs to be flexibility with Overseer- it is a model only. Needs to allow for adverse weather events, major market issues etc. Having only registered FEP experts creates a climate for price hiking.</p> <p>Time needs to be allowed to meet N leaching limits- better to create a process of improvement over time which most farmers try to do anyway than imposing arbitrary levels which may be impossible or uneconomic to meet especially in this area where many farms are still in an early development phase. The ability for Environment Waikato to make an ad hoc change to the model is also of concern.</p> <p>I am also concerned that this is not practical because we need certainty to be able to invest in the changes imposed on us and some flexibility to cope with weather events and other events such as stock health issues.</p>

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44	Rule 3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production			
45	Rule 3.11.5.7 Non-Complying Activity Rule – Land Use Change	OPPOSE	Amend 3.11.5.7 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities including the inability to adapt my farm for changes in either market-driven activities eg from dairy to dairy beef . This is a family farm close to town and it may be a business decision choice to change to grazing stock. The opportunity cost to intensify or change land use is important especially as this is a developing and rougher-contoured property. As parts of the land are being developed we need to go through a process of clearance, cropping for weed control and contouring and then into permanent pasture.
46	Schedule A: Registration with Waikato Regional Council			
47	Schedule B: Nitrogen Reference point	OPPOSE	Amend Schedule B as requested by Federated Farmers in their submission. There should be some flexibility to the determination of the base years.	This proposal will impose significant costs on my farming activities including As outlined above 2014-5 and 2015-16 have been years when this property has not had a stock increase because of management issues, weather and market returns. Using these as a base for the NPR will have a

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			<p>Other influences need to be accounted for</p> <p>Other alternatives to Overseer need to be considered. It is a model and so provides a generalised understanding of systems but these are often found to be faulty in practice.</p>	<p>significant financial impact. At a normal stocking rate of 40 more cows a \$6 payout for milk would make a difference of \$96,000 a year return.</p> <p>The potential inability to farm at the current level would make this land decline in value. This could result in several million dollars of investment being lost.</p> <p>Being required to limit N also limits the funds available to reduce other losses.</p> <p>The proximity of this property to the Kinleith mill already affects the quality of base groundwater.</p> <p>Farmers need to be able to illustrate their ability to improve environmentally using other science. As technologies improve so will the parameters used.</p>
50	Schedule C: Stock Exclusion	OPPOSE	<p>Amend Schedule C as requested by Federated Farmers in their submission.</p> <p>Fencing waterways has caused other environmental issues.</p>	<p>This proposal will impose significant costs on my farming activities including weed and pest control. The build up of willow in the Greyhound Wetland and other parts of the farm which has occurred since they have been fenced will cost several thousands of dollars to clear and then to prevent the willows from re-establishing.</p> <p>Requiring the fencing any intermittent waterways is not practical. It limits access for stock to paddocks creating management issues and provides a haven for weeds and pests. It is also subject to the personal view of the environmental agent concerned..</p>

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51	Schedule 1: Requirements for Farm Environment Plans	OPPOSE	Amend Schedule 1 as requested by Federated Farmers in their submission. Proposal requires a duplication of what is already being done	<p>This proposal will impose significant costs on my farming activities including the duplication of monitoring which is already required by Fonterra.</p> <p>The avoidance of cultivation on land over 15⁰ would make most of this land unfarmable. The value of the land would then plummet as would the productive return of the land.</p> <p>FEP requirements will add significant cost to my operation- estimated additional \$3000-\$10,000 based on advisors and farm management time. Nutrient budgets and nutrient management plans are things we have done for a number of years in conjunction with the fertiliser companies.</p>

Appendix i - Greyhound Wetland



Legend

- Site boundary
- Cadastral boundary



Data Acknowledgement
 Imagery sourced from Terralink International Limited (TIL) 2007 and is the property of TIL and the Waikato Regional Aerial Photography Syndicate (WRAPS) 2007. Copyright Reserved/ NZ TOPO50 Crown Copy Reserved

Report: 2830
 Client:
 Ref: 01 1270
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 File: 150_Sites\BF35UP277.mxd

**BF35UP277
 Greyhound Road Wetland**



Disclaimer: Map only depicts one site, other significant natural areas may be present on this map sheet, but their boundaries and location are not shown on this map.

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Scale: 1:5,000
 Date: 15/12/2011
 Cartographer: FM
 Format: A4

GREYHOUND ROAD WETLAND

Site Number: BF35UP277
Valuation Number:
Easting, Northing: 1845814, 5764833
Area (ha): 13.78
LCDB2¹ Class: Broadleaved indigenous hardwoods

General Description: This site comprises a large area of wetland and open water on a tributary of the Waioraka Stream. The vegetation is dominated by grey willow forest with a dense indigenous understorey that includes turutu, *Carex virgata*, toetoe (*Austroderia fulvida*), *Coprosma propinqua*, *Eleocharis* species, *Machaerina* species, *Juncus* species, rarahu, and tangle fern. Emergent ti kouka, and wheki are scattered throughout and there are small bodies of permanent open water present. On the margins and drier areas, native lowland forest species are regenerating, including manuka, tutu, pate, koromiko, makomako, and karamu (description summarised from Beard 2007).

Features:

Flora: No Threatened or At Risk species have been recorded from this site.

Fauna: North Island fernbird (At Risk-Declining) have been recorded from this site (Beard 2007).

Ecological Significance: This site is significant because it comprises a large, good quality area of wetland vegetation that provides habitat for an At Risk indigenous bird species. Wetlands are under-represented regionally and nationally.

Notes: A field inspection of this site was undertaken in 2012.

This area was surveyed in study of natural areas in the area in 2004 (Wildland Consultants Ltd Report No. 607), however subsequent to this study a fire swept through the area which resulted in significant changes to the vegetation composition at the site (James Piddock pers. comm.).

¹ New Zealand Land Cover Database Version 2 - A database that classifies land cover for the whole of New Zealand into 43 classes based on satellite images. Satellite imagery from the 2001/2002 summer was used to derive land cover classes with a minimum mapping unit of 1 ha, and utilises the reflectance of different surfaces/vegetation types to delineate class boundaries and habitat types. Classes are ground-truthed and modifications made where necessary.

Appendix 2 - photos of Greyhound Wetland, planting and farm

