

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	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

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

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 Please Note: if you fax your submission, please post or deliver a copy also
Emailed to	healthyivers@waikatoregion.govt.nz Please Note: Submissions received by email must contain full contact details. We also request you send us a signed original by post or courier.
Online at	www.waikatoregion.govt.nz/healthyivers
We need to receive your submission by 5pm, 8 March 2017.	

YOUR NAME AND CONTACT DETAILS		
Wiremu Trust		
850 Sandel Rd, RD 1, Mangakino 3492		
wiremutrust@farmside.co.nz	07 8828593	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Helen Thomas		
850 Sandel Rd, RD 1, Mangakino 3492		
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PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION	
<input checked="" type="checkbox"/>	I wish to speak at the hearing in support of my submissions. Yes
<input type="checkbox"/>	I do not wish to speak at the hearing in support of my submissions.

I could not gain an advantage in trade competition through this submission. No

Helen Thomas

SIGNATURE **OF** **SUBMITTER**
(or person authorised to sign on behalf of submitter)
Signature is not required if you make your submission by electronic means.

Signature *H Thomas* 6 March 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.

SUBMISSION POINTS: General comments

We own dairy and support properties totalling 459 Ha including forestry areas in the sub catchment 71 of Mangakino. We are a family operation and presently our daughter is 50/50 sharemilking on the farm. Stock number vary with the season and payout and are presently at a low 600. Part of the business is a run-off and we would like to keep this separate in case of sale in the near future. We run a system 2 with and prefer to be self contained but weather frequently interferes with that aim.

We have picturesque farm with timber stands and shelter for stock from sun and wind. Most of the water courses have been fenced for about 20 years, except for the place we picnic which we kept access to. There is a problem with fenced off areas as they tend to grow blackberries and other weeds and need spraying.

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 of 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 wish to be heard at the Hearing.

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.

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Section number of plan change		
<p>“ Background and explanation.” Pge15 Do not Support</p>	<p>‘Current understanding is that achieving water quality restoration requires a considerable amount of land to be changed from land uses with moderate to high intensity of discharges (eg though reforestation)’</p>	<p>This would have serious ongoing effects for the community and the nation. Forestry needs to be harvested and serious chemicals are used in the process. The mill at Kinleith has a river of red scum / algae that flows into the Waikato River at Lake Maraetai.</p> <p>The yellow pollen from pine trees can cover surfaces, including Lake Taupo (feeds the Waikato River) and farm and all other surfaces. I believe this is nitrogen pollution.</p> <p>Trees have a life cycle like grass and although of a longer term the result is the same. It is just a growing cycle, but with timber as an end result, not milk, meat or vegetables. The other alternative is non harvested native trees which would be beautiful but the social effects are unimaginable. Great for tourists to drive through but NZ’ers would need to find another place to live and source an income. NZ is already too populated for that scenario.</p> <p>Community as expressed on Pge 22 would cease to exist.</p>
<p>“Background and explanation” Pge 15 Agree but with additions</p>	<p>‘A <u>property</u> scale nitrogen reference point be established by modelling current nutrient losses from each <u>property</u> with no <u>property</u> being allowed to exceed its reference point in the future and higher dischargers being required to reduce their nutrient losses’</p>	<p>Use a Fresh Water Management Unit /<u>catchment reference point</u> not a <u>property reference point</u>. This is still ‘grandparenting’, <u>Use the time reference point to assess the 75th percentile and no property in that sub-catchment can be in excess of that point.</u> This does not punish the property owners at the lower end of pollution and already using “good management practises”, which may have been compromised in 2014-15 or 2015-16.</p> <p><u>Going forward if the level of need for restrictions increases or decreases it will be much more simple and cost effective for WRC to lower or increase the level at the catchment level to apply to farms in that area.</u></p> <p>This also <u>encourages community support to deal with a problem</u> and will improved outcomes in the long term objective of cleaning up the river</p>
<p>“Background and explanation” Pge 21 support</p>	<p>Value of water</p>	<p>Water is our life force, especially when joined with land</p>

3.11.3.Policy 2c Tailored approach to reducing diffuse discharges from farming activities Pge 30 Agree but with modification	Establishing a nitrogen reference point for the (property or enterprise)	Establish a nitrogen reference point for the <u>catchment or sub-catchment</u> and apply it to the property or enterprise
3.11.3 Policy 4 Pge 31 Agree	Manage sub catchment wide diffuse discharges of nitrogen, phosphorous, sediment and microbial pathogen.	<u>Sub- catchment</u> is considered acceptable reference point in this case so should be acceptable in all cases
3.11.3 Policy 10 Pge 33	Point source discharges of regional significance	Yes allow for continued operation of point source discharges from regionally significant infrastructure and industry, but allow land based users the same privilege
3.11.3 Policy 11 Pge 33	Point Source -Best practise	Yes but same allowance for land based industries
3.11.4 Farm Environment Plans Pge 36	Farm Environment Plans	The certified person should work with the land based industry proprietors in an educational manner, not as an auditor. The outcome will be superior
3.11.4.5 to 11. Sub catchment scale planning Pge 37 Strongly agree	Excellent section	Working together in a sub catchment is the logical way forward
3.11.5.2.a Permitted activity Rule Pge 40	Where the property area is greater than 20 Ha	Nitrogen reference point should refer to catchment level total and then applied back to property.
3.11.5.2.c Permitted activity Rule Pge 40 Very Strongly disagree	No part of the property or enterprise over 15 degrees slope is cultivated or grazed	A 15 degree slope has very little run off and grazing of most farms in NZ will be compromised. In our case almost every paddock would be unable to be grazed. Cultivation is needed to sow pasture in species that perform in a better productive and environmentally friendly way. A poor species needs more chemical fertiliser.
3.11.5.2.c Permitted activity Rule Pge 40 Very Strongly disagree	No winter forage crops are grazed in situ.	Soil has physical, chemical and biological properties. By grazing stock on winter crops carbon is added to the soil. Carbon will absorb minerals and keep them from washing away. Carbon is important to build up soil, especially in pumice country. Additionally carbon is used as a filter in filtration plants. There is a lack of science on leaching.

3.11.5.2.e.ii Permitted activity Rule Pge 40	Wild pigs in DOC area adjoining	Our problem is keeping herds of 20-30 wild pigs from DOC area adjoining the property out of our land. They have free access to the stream and river, and dig up our paddocks Recommend DOC properties follow the same rules as other land owners.
3.11.3.5 Phosphate use on land	General to this section	We have not applied phosphate to our land between 2010 and 2016 except a small amount on crops. As education became available to understand effects of surplus phosphate on land and waterways, we voluntarily removed phosphate from our fertiliser. We now have very low levels and need to apply again. We trust this will not put us a disadvantage going forward as it was intended to help the environment.
3.11.5.2. b.i. Permitted activity rule 'Where land is used for grazing livestock the stocking rate of the land is no greater than 22 October 2016'	An average of 5 years at October annually is fairer to all	Because of lack of phosphate, our stocking rate was very low at this point and may have been so for others with the low payout and weather problems
3.11.5.4. Controlled activity rule - Farming activities with a farm environment plan not under a certified industry scheme. Pge 43. Matters of control iii	The actions, timeframes and other measures to ensure that the diffuse discharge of nitrogen from the property or enterprise, as measured by the five year rolling average annual nitrogen loss as determined by the use of the current version of Overseer, does not increase beyond the property or enterprises Nitrogen reference point, unless other suitable mitigations are specified.	1; The nitrogen reference point should be set as the sub-catchments level 2; The five year rolling average nitrogen loss should be used with all properties.
Schedule B Pge 47	Nitrogen Reference Point	Nitrogen reference point should be calculated as defined and then used as a catchment or sub-catchment reference by using all farm data and averaging it out over a per hectare basis. This avoids 'grandparenting' disadvantages in a particular year or farm.

Schedule B Pge 47 Definition of a stock unit Pge 84	g.i; Stock numbers	Definition of a dairy cow (450kg F8J8 producing 400 kgMS) is 10.4 stock units. The Lincoln assessment of a stock unit 2003 is 450kg dairy cow with 385 kgMS is 8.4 stock units. The difference on production is minimal. The stock units used should be as Lincoln measure. This would make a huge difference over a farm.
Schedule B Pge 47 Nitrogen Reference Point Overseer parameter settings that must be used	'Farm model, the model is to include non-contiguous properties that are part of the same enterprise that are part of the same catchment.'	If farm has a block down the road and wishes to sell it, what allocations are made then? <u>Leave as separate entities.</u>
Schedule 1. Requirements for farm environment plans	Training and experience of practitioner	Need a person with appropriate experience in the area and with the soil types being dealt with.
Hydro Lakes		The Hydro lakes are important for the NZ economy and environment. They do however contribute to the reduced quality of the Waikato River. <u>Monetary value should be subsidised to WRC so staff can be employed to help land owners with mitigation on the land</u>
Rural Communities		If land owners are impacted too heavily rural communities will not survive. There are no spare houses and jobs in towns and cities
Speed of Process	Reviews needed	This is a lot of pressure in a small space of time.
Cost of process	Considerable	Payout has been extremely poor and loans need repaying. Loss of income moving forward from these changes means less income coming in to pay for all the extra commitments