

# 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	
<b>FOR OFFICE USE ONLY</b>			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

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

SUBMISSIONS CAN BE	
<b>Mailed to</b>	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
<b>Delivered to</b>	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
<b>Faxed to</b>	(07) 859 0998 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
<b>Emailed to</b>	<a href="mailto:healthyivers@waikatoregion.govt.nz">healthyivers@waikatoregion.govt.nz</a> <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>
<b>Online at</b>	<a href="http://www.waikatoregion.govt.nz/healthyivers">www.waikatoregion.govt.nz/healthyivers</a>
<b>We need to receive your submission by 5pm, 8 March 2017.</b>	

YOUR NAME AND CONTACT DETAILS		
Full name: Angela Margaret Fullerton		
Full address : 516 Otorohanga Road, RD 3, Te Awamutu 3873		
Email : <a href="mailto:afullerton@xtra.co.nz">afullerton@xtra.co.nz</a>	Phone 07-871-1911	Fax n/a (mobile 0272611470)

ADDRESS FOR SERVICE OF SUBMITTER		
Full name		
Address for service of person making submission		
Email	Phone	Fax

TRADE COMPETITION AND ADVERSE EFFECTS (select appropriate)
<input checked="" type="checkbox"/> I could not gain an advantage in trade competition through this submission.
<input checked="" type="checkbox"/> I 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.

①

## SUBMISSION POINTS: General comments

I own a 160 Ha Dairy Farm milking 480 cows in the Waipa Catchment (Pirongia Ngutunui Road Branch Sub catchment 43). We are a family owned and run business, dairy farming and nurturing animals is in our family history and we endeavour to always improve the land and infrastructure to leave it in a better state for my children. Over the last 10 years we have moved from a System 3 to a System 5 Farm which means we feed supplements on our concrete feed pad all year round (imported feed not grown on farm). This was a business decision on top of a personal view that we had to be able to fully feed our cows every day of the year. We have 3.2 Cows to the Ha, bigger Holstein Friesian Animals producing 575 kg milk solids per year. Our Nitrogen Reference Point is 39-41 depending on which crop is grown on the farm. (39 with Chicory Crop or 41 with Maize Crop)

We are in the process of changing from a spring calving farm (all calves born 15 July -15 Sept) to a split autumn/spring calving period (200 cows to calve 15 March-15 May and 250 cows to calve 20 July – 30 August). We are moving the calving date with our existing herd which will take us 4 years to complete. This process started in 2015/16 year with 55 Autumn Calvers, 2016/17 with 90 Autumns, 2017-18 est 140 cows to calve, 2019-20 est 200 cows to calve in the autumn. The business decision to move calving dates and milk year-round was based on:

- better utilization of capital (built new Rotary Shed, Build new concrete silage bunkers, increased area of Effluent Lines to over ½ of milking platform)
- changing weather conditions – longer dry periods Jan-Mar growing less grass in summer and more in the winter.
- Succession on Farm – son coming back on farm after 5 years working on other dairy farms. He has the drive and vision for this change which requires someone with good cow management skills.
- Allows us to employ 3 Full time staff (previous only 2.5 FTE)
- Improves cashflow and when we have the calving split correct it will improve profitability

In the future, we plan to milk year-round and be split calving we will need to be adaptive to new ideas and farming techniques which will keep us profitable so we can continue to pay our mortgage and employ staff. We will have considerable expense in the short-term if our effluent storage ponds do not pass their drop tests (booked for September 2017 when they will next be 75% full). If they do not pass we will need to build completely new effluent storage system which could cost \$150,000-\$250,000 depending on which system you put in. As monitoring and providing Council with data increases we will have additional business costs (\$10,000 capital Set up costs for electronic wireless monitoring and \$1200 yearly fees).

All our waterways are fenced. We have planted the steeper gullies in Pine Trees 16 years ago, we have permanently fenced and riparian planted one smaller gully with natives but have been losing battle against blackberry in one corner. We have a plan for "riparian planting" other wetter areas, but am waiting for more research on benefits of leaving these areas in grass where we don't have to fight weeds, blackberry or gorse.

I support the overall intent of this plan change, and the stage approach to 10% of the 2096 targets, but do have some concerns that need reviewing. There will be little provision for changing your dairy farming system – this doesn't allow for younger generations or new owners to make significant changes to a business which happens to be located at a specific property address (other businesses in an urban situation may not have the same business constraints). These constraints will have a huge impact on our rural towns and communities. I am particularly concerned about the following aspects of Plan Change 1.

- The cost of administering the plan – and the availability of certified nutrient advisors
- The Farm Environment Plan concept requires unnecessary details that will increase the cost to the farming sector.
- A Broad approach for every property in the Waipa catchment to spend \$ in the next 3-10 years where science and common sense might suggest there are specific hotspots in sub catchments which would be less costly to address than the combined cost of every individual property.
- Capping the Commercial Vegetable growing area to 2016 production area is short sighted for our Nation. Are we seriously going to get our vegetables from overseas when there are perfect growing conditions and soils in the Waikato? PC1 appears to benefit current commercial vege growers rather than the our nations interest.
- Time frame for NFP too short – we work on a cropping rotation of 15% of farm which would indicate a 6 year cycle. If Vege growers have 10 years why can't other industries?

- Definitions and numbering of plan is unclear.
- All property owners should be treated fairly no matter ethnicity, any Maori Land issues should be dealt with at a Central Government Level.

**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
31	<b>Policy 3.b &amp; 3.c</b>	<b>Oppose in part</b>	The provision gives some consideration to combining sub catchments and increased area to match population growth.	NZ population is growing. Auckland is expanding into Pukekohe Area which will push commercial growers into different sub catchments. No reference to an enterprise covering multiply sub catchments.
40	<b>Rule 3.11.5.2</b> Permitted Activity Rule – Other farming activities	<b>Oppose in part</b>	Where property >20 Ha not allowing a 15degree slope to be grazed needs to be removed.  Review no Cultivation with 5m of waterway should be changed to reflect contour of land adjacent to waterway and the risk associated.	15 Degrees is not very steep and many lifestyle blocks would have land this steep that is grazed – many of these farms/lifestyle blocks would not have access to an industry scheme so would be costly.  Needs a definition of cultivation. Flat contour is less likely to run into waterway compared to sloped land. Peat Land should not fall into 5m rule as you will be creating other issues with water not being able to get away as waterway edge will become higher then paddock.

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
41	<b>Rule 3.11.5.3</b> Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	<b>Support in part</b>	<p>Farm plans recognise what has been done to date. Farm plans should give guidance on what mitigations could be done to reduce the 4 contaminants that might not be recognised in overseer.</p> <p>I have addressed Schedule A,B,C,2 individually</p>	<p>I really endorse the farm plan process so solutions are tailored to individual properties, however these plans need to look holistically at reducing the 4 contaminants not just look at Overseer numbers.</p> <p>There are hotspots on farm which might provide a better outcome for water quality (ie cut outs on raceways to divert run-off) but these may not be recognised in Overseer. Another example would be a wetland area needs to be .5ha in overseer.</p>
42	<b>Rule 3.11.5.4</b> Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	<b>Support in part</b>	Should state somewhere that both FEP thru this rule or certified Industry scheme should be same conditions.	One rule shouldn't be easier/harder than the other

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
44	<b>Rule 3.11.5.5</b> Controlled Activity Rule – Existing commercial vegetable production	<b>Oppose in part</b>	Review Economic costs to Nation if commercial vege growing area limited for next 10 years. Area should at least match increased population	<p>NZ population is growing. Auckland is expanding into Pukekohe Area which will push commercial growers into different sub catchments.</p> <p>Concerned new commercial growers will be unable to get consent if they weren't growing in that subcatchment prior to 30 June 2016</p>
45	<b>Rule 3.11.5.7</b> Non-Complying Activity Rule – Land Use Change	<b>Support in part</b>	<p>The provision considers land use in previous years as there are many small farms in the greater Waikato that change from dairy to dairy support to maize from year to year which may not be captured in the 2 year period 2014/15 to 2015/16.</p> <p>Clarify why some forestry to dairy can still continue under the code of compliance umbrella.</p>	<p>This proposal could impose significant costs on my farming activities as we lease our neighbours property over the winter (April-Sept) months. On paper his farm plan would indicate he is crop farmer (Maize Silage) but our cows graze the property and milk off the land for a period of time which is not counted in our farm plan as we have no control over the fertiliser or nutrients he puts on. A bit of grey area with lease land.</p>
46	<b>Schedule A:</b> Registration with Waikato Regional Council	<b>Support in part</b>	The schedule needs to review how much information is needed from new owners if property is already registered.	Database Access – no need to recreate an entirely new registration when only (a) new land owner changes. There must be some avenue in future to transfer property details (b,c,d,e,f,6) – if these haven't changed.
47	<b>Schedule B:</b> Nitrogen Reference point	<b>Support in part</b>	<p>Increase reference period from 2014/15 or 2015/16 period to a 12-month period in the last 5-10 years (same as commercial vege growers). If we can supply the data, why not use other years?</p> <p>Farmers need time to make changes in their business and on farm.</p>	<p>This proposal puts pressure on a "N" number rather than focussing on profitability. How will we know if a small change in number is going to really make a difference when we are talking lag or the hypothesized N lag to come.</p> <p>Nitrogen has such a direct relation to increasing grass growth at the least cost. There needs more science in sub catchment to demonstrate that the NRP is going to help</p>

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
				<p>water quality. We will become more profitable as a business by changing our calving pattern. We are in 2<sup>nd</sup> year of 4-year process, With Overseer modelling shows a slight increase in NRP 41 to 43. It will be the 5<sup>th</sup> year when our investment or correction in production is realised. If we are not running a profitable business we are not able to make improvements which might provide better outcome for our waterways.</p> <p>Is N the right thing to be focusing on if we want to have an economically stable community? Our local school – Korakonui is filled with kids from farms or parents who work on farms. If we have to change or limit our nitrogen usage my community will be affected, my local school will be affected, the school bus run will be reduced so our Road may not be on the bus run any longer – which means it's harder to find family's that want to come to farm without bus service. This focus on "N" has significant costs to my community. Please focus on science</p>
				<p>We have grown only small amount of Maize silage (2ha) in the last 2 years whereas we have been growing 21 Ha of chicory. We are planning on changing or supplementary feeds and increase Maize grown on farm to decrease feed costs, however our NRP changes from 41 to 43.</p> <p>If we plant other species of plants that are scientifically recognised as being better for NZ leaching will Overseer accept these and lower our number.</p> <p>I have been planning on my son to come home and buy into the sharemilking side of our business – he wants to grow and improve the farm and I worry we will placing hardship on future generations and sharemilkers if we are not a bit more flexible with making changes to a farming business. Focusing so much on "N" costs dairy farmers in the pocket and truly will hamstring our young folk when we need to be attracting them into agriculture.</p>


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
			<p>Page 48</p> <p>Table 1 – Recommend changing animal liveweight section to: "if accurate live weights are not available use national averages"</p>	<p>Our N number will be quite different if we don't use accurate animal liveweights (probably lower). The National average weight is 500 or 550 kg whereas our herd weighs 600 average. This should be reworded to use "actual" or national average liveweights.</p>
50	<b>Schedule C:</b> Stock Exclusion	<b>Support</b>	<p>Keep the rule about not moving existing fences.</p> <p>More clarity on definition of water body.</p> <p>Does this include man made dam for drinking?</p> <p>Does it include man made ponds</p>	<p>We need absolute clarity so all farmers understand the various definitions of a water body. And this definition should be listed in glossary of terms.</p> <p>The same definition should be used nationally across all accords, plans etc.</p>
51	<b>Schedule 1:</b> Requirements for Farm Environment Plans	<b>Support in part</b>	<p>Review what WRC is asking in the farm plan – stick to environmental issues – it is not WRC duty to ask about other issues in the farming business..</p>	<p>I personally view each property having a plan is the right method. I am questioning some of the definitions and the science behind requirements. This is only a Farm Environment Plan I believe there are aspects of this PC1 Farm Plan is going much wider then "Environment" aspect wanting "stocking policy" "maintaining and improve the physical and biological conditions of soils" I do not want WRC asking about other aspects of my business (strategy, H&amp;S, which are outside of this scope.)</p>



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
			<p>Review definition of Cert Farm Planner – 5 years' experience in farm systems reduced to 2 years?</p> <p>Definition of setback is unclear – would recommend a drawing for clarity</p> <p>Definition of Slope – no definition found.</p> <p>Minimum Cultivation set-back 5m. Suggest a different setback (m) for slope of cultivated paddock. (ie. 1 m setback for flat, 3 m less than 15, 5m over 15 degrees). Also, need more words around definition of cultivation</p>	<p>Certified Planners – will there be enough? New graduates couldn't fill the 5 years' experience in many cases this could be reduced?</p> <p>Set back from drain bed – is this at flood level or normal level? A picture or drawing should be here so everyone knows what it means. I have steep drain banks do these counts?</p> <p>I do have a race alongside a drain/waterway. It would be unpracticable for me to move this, so the definition of setback is critical for absolute clarity.</p> <p>We all need to be calculated/evaluating slope from same method.</p> <p>This will be costly for my farming business. We plant 20Ha of crops each year. We prefer to use roller drill for small seed crops (chicory, ryegrass, clover, turnips) which requires preparing a seedbed before planting. This is a light 1-3 cm cultivation before roller drill drops seed. This year I left the 5m edge around a drain to be direct drilled. We use contractors for planting which meant 2 machines to drive to farm to plant one paddock. It was a disaster, roller drill arrived first and a week later the drill was coming past farm and did the wee strip beside water way. (damaging newly germinated chicory in the process). Costly to pay for two machines to come to farm for same paddock.</p> <p>I have 15% of farm completely flat with drains on 1 or 2 sides of paddock – I would not be able to fix damaged pugged pasture if I didn't lightly cultivate before planting in a crop or sowing back into grass. This would be a negative for our flats which are some of the most productive land on farm.</p>

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
			<p>"appropriate measures to minimize the risk" should be changed to ??? who determines what is appropriate</p> <p>Definition of Forage Crop: "means <i>crops, annual or biennial, which are grown to be utilised by grazing or harvesting as whole crop</i>"</p> <p>This could apply to pasture probably need better description as I believe you are trying to capture crops grazed in winter in situ?</p>	<p>For 7 years we used a no-tillage (or direct drill) programme for the majority of our cropping and replanting program. We had very mixed results, increased bug populations, and more weeds. So we have gone back to light cultivation and roller drill to maximise our crop. With a 5m cultivation set back restriction our Overseer numbers will get worse if we grow less grass/maize. There needs to be some common sense here – and is there science to demonstrate this on our various soil types?</p> <p>An annual grass pasture is different to winter forage crop of Kale – but these both would come under the "forage definition?"</p>

**I Do wish to speak at the hearing in support of my submission**

  
 Angela Fullerton 2 March 2017