

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 <i>Please Note: if you fax your submission, please post or deliver a copy also</i>
Emailed to	healthyivers@waikatoregion.govt.nz <i>Please Note: Submissions received by 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/healthyivers
We need to receive your submission by 5pm, 8 March 2017.	

YOUR NAME AND CONTACT DETAILS		
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PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION
Yes I wish to speak at the hearing in support of my submissions.
<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.

SIGNATURE

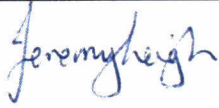
OF

SUBMITTER

(or person authorised to sign on behalf of submitter)

Signature is not required if you make your submission by electronic means.

Signature



Date 4 / 3 / 17

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

This upper Maire creek sub catchment is on behalf of our community of 15 farmers greater than 20ha that farm this sub catchment representing 4000 hectares of hill country farm land in the Priority 1 lower Waikato River Riverine lake FMU.

We are low intensity family farmers with negligible nitrogenous fertiliser use and predominantly sheep covered hill country but require cattle for income, pasture, weed and parasite control. We are proud of where we live and believe our water is extremely good from the water testing we have done.

In the future, we plan to continue farming the way this land has been farmed for generations, continue to fence bush and high risk streams on low lying land where practicable and improve our water quality even further. We require flexibility to adapt to market conditions and alter our stocking mix of sheep and cattle and increase stocking rate on areas that are fit for it to mitigate the environmental stewardship costs.

Our sub catchment water quality has not been assessed by WRC and the closest WRC testing site according to PC1 Table 3.11.1 is the stream from Lake Whangape on the Glen Murray / Rangiriri road, some 32 km away (25.5km to the start of Lake Whangape as measured along the creek length) (Appendix 1). The table data is incomplete but the attributes of the stream flowing from the lake are not far off 80 year targets, despite the shallow lake appearance. Our unique upper Maire creek sub catchment comprises 4000 ha (40 square km, 9880 acres) and is low intensity farming with sheep and beef farmers, no dairy farming, forestry (native and pine), no winter cropping and very limited cultivation or brought in feed.

A natural waterfall (appendix 3) prevents koi carp coming into our sub catchment which we believe contributes greatly towards our water quality and creek bank health. Flooding events are fierce and elevate creek levels rapidly and to high levels in high rain events, especially noticeable at the sub catchment exit farm (Appendix 2).

Without targets in table 11-1 which relate to our sub-catchment we have no scientific evidence of the current water quality or a target to work towards.

We believe this plan does little to reduce contaminants from low lying intensive farming areas (from blanket nitrogen grandparenting) and apportions an unfair share of costs on the low economic hill country without testing this upper sub catchment water to determine if it is actually contributing to the problem. We are in favour of a sub catchment approach to improving water quality.

Overall we support the vision for the region's waterways but oppose a blanket set of rules. High discharge practices should be improved first.

We are particularly concerned about the following aspects of Plan Change 1:

Nitrogen reference point – limiting our ability to farm to the conditions, raise stocking rate or change stock class where appropriate, the effect on our businesses and future of our farming families.

The impractical nature of fencing all water bodies for stock exclusion when the effect on our water has not been measured by council except well downstream (Lake Whangape).

The crippling cost of all mitigation strategies (including water reticulation) and the ongoing negative effect on our farming communities

Improving our water further as initial sampling shows we are already exceeding the 80 year vision with respect to water quality.

The lack of science and monitoring at the sub catchment level including that fact that that PC1 does not mention the damage of koi carp further down the stream

The fact that high risk conversions from forest to dairy can continue for some iwi groups could be seen as discriminatory

A costly Farm environment plan that will require increased expenditure while we are expected to spend more but earn less. Intensive farms with know nitrogen issues should be targeted first.

The limited time frame for all catchments but especially Priority one catchments. This is unrealistic practically and financially.

Overall we believe PC1 is poorly written, contradictory and shows no understanding of either the financial situation of hill country farms or the minimal discharge from them. Hill country land is understocked and for improvements to be made unfortunately stocking rate has to increase.

We are concerned about the having to spray weeds near waterways when they are fenced and the effect on water quality from this. Also the potential effects of arsenic leaching into waterways from using treated pine fence posts.

The effects of climate change and sea level rise should be considered. How much of the Waikato river and low lying lakes such as Whangape will be tidal with sea level rise or 1 -2 metres estimated over 80 years.

We wish to be heard at the Hearing and will appoint a spokesperson

We are concerned about the implications all of this will have for our properties and for our current activities as described above. We have set out our 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	Support with amendments	We support a permitted activity rule for small and low intensity farming activities however we oppose the blanket requirement to exclude livestock and believe the stocking rate threshold is too low.	<p>We ask that clause 2 exclusion of livestock from waterways is removed and replaced with “best practicable option”.</p> <p>We think that the stocking rate in clause 5 should be increased to 14 stock units per hectare of total enterprise land.</p>
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</p> <p>Remove Nitrogen reference point</p> <p>Water exclusion less than 15 degrees except in high flood zones where other mitigation necessary eg practical trough placement</p> <p>Dates are not realistic practically or financially especially Priority 1 catchment</p> <p>Certified Farm Environment Planner should be achievable for farmers who have the necessary qualifications.</p>	<p>This proposal will impose significant costs on our farming activities whilst not being able to increase income</p> <p>We are also concerned that this is not practical because of the crippling costs involved, our high and fast flood levels in the lower catchment.</p> <p>Farmers will listen to other farmers more being told from someone who doesn't understand the fundamentals of farming hill country.</p> <p>The MCI data collected by council shows that hill country streams have excellent water quality not far from native bush. More testing required.</p> <p>Consideration needs to be given to the level of water quality improvement needed in the sub catchment.</p> <p>It is noted that the proposed amendments to the National Policy Statement for Freshwater Management 2014 (NPS-FM) require stock exclusion on slopes up to 15 degrees as of 1 July 2022 and only require fencing of waterways above 15 degrees, where break feeding is occurring. We support this approach and seek that PC1 is amended to reflect the</p>

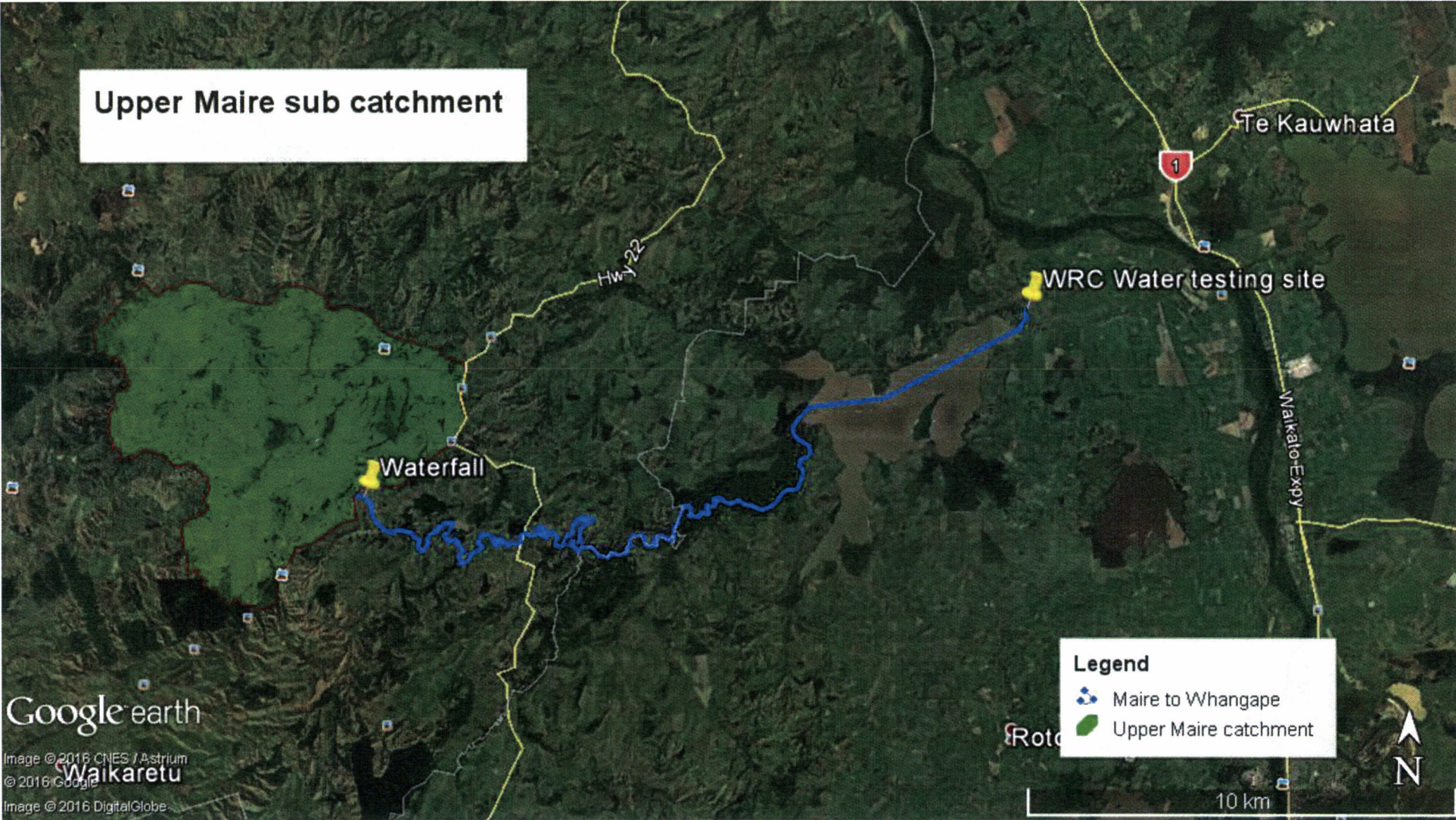
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				same requirements.
42	Rule 3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	OPPOSE	<p>We support a permitted activity rule for farming activities however we oppose the blanket requirement to exclude livestock (3).</p> <p>We oppose the grandparenting of the Nitrogen Reference Point as it allows existing high discharge rates to continue and limits the flexibility of other enterprises which may have low emission rates. This rewards existing polluters.</p>	<p>We are concerned that a nitrogen reference point rewards the high nitrogen users and doesn't achieve the 80 year vision</p> <p>Consideration needs to be given to the level of water quality improvement needed in the sub catchment.</p> <p>A base allowable discharge for the sub-catchment could be set based on total discharges in the catchment and the level of water quality improvement needed to meet the short term and 80 year targets.</p> <p>Higher dischargers should be required to move towards these targets and lower dischargers should be provided with flexibility to increase their discharges up to the acceptable level rather than being penalized for having existing low discharges.</p> <p>As noted previously, the proposed amendments to the National Policy Statement for Freshwater Management 2014 (NPS-FM) require stock exclusion on slopes up to 15 degrees as of 1 July 2022 and only require fencing of waterways above 15 degrees, where break feeding is occurring is practicable and achievable.</p>
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 to our farming activities including not being able to control woody vegetation (Kanuka, gorse) that takes over good land.

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				<p>We are also concerned that this is not practical because we cannot predict accurately what the future may hold.</p> <p>Consideration needs to be given to the level of water quality improvement needed in the sub catchment.</p>
46	Schedule A: Registration with Waikato Regional Council	Support with amendments	<p>Any date chosen should surely be mid winter, 30 June, as lowest stocking point.</p> <p>Water bodies in schedule C needs clarifying and needs to follow national guidelines, 1m wide, 30cm deep.</p> <p>Stocking rate is not a useful measure.</p>	<p>WRC should have most of this information already from rates collected.</p> <p>Stock units are an inaccurate measure of carrying capacity, vary with livestock weight and efficiency of livestock and at best a rough guide. Therefore stocking rate is inaccurate. If used, stocking rate should be used over the whole farm area. Stocking rate may encourage farmers to farm heavier animals with more environmental damage.</p>
47	Schedule B: Nitrogen Reference point	OPPOSE	<p>We seek that the Nitrogen reference point is only required in sub-catchments where there is an issue with nitrogen.</p>	<p>This proposal will impose significant costs on our farming activities including being unable to develop poor land, being fixed into one stock policy, being unable to increase stocking rate to pay for water reticulation and fencing of water bodies. Meanwhile the high emitters can continue to degrade the water ways.</p> <p>Nitrogen and Phosphorus are not an issue with hill country farms. Neither are the other contaminants in our extensive operations. More testing and science required in upper catchments.</p> <p>We are also concerned that this is not practical</p>

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				<p>because this will be difficult to monitor and enforce. How these are managed is surely more important. What about farms that have been low stocked for whatever reason in 2014/15 and 15/16</p> <p>We don't believe Overseer was designed to be a regulatory tool, certainly not on hill country farms with our soil types. It should be restricted to those sub catchments it was designed for with Nitrogen issues.</p>
50	Schedule C: Stock Exclusion	OPPOSE	We suggest that the schedule is amended to include "best practicable option" as an alternative to fencing of all waterways.	<p>This proposal will impose significant costs on our farming activities including being financially crippling and not required if water quality meets the 80 year vision now.</p> <p>We are also concerned that this is not practical and we would be far better to follow the national standards that are more realistically achievable.</p> <p>Fencing waterways then allows weeds to grow which need spraying. The maintenance involved with cleaning debris off fences and repairing fences after 4-5 flood events per year is cost and time prohibitive.</p> <p>We are conscious of parts of the creek in which cattle do wander into during summer and in these paddocks troughs or dams can be used to prevent this. Fencing does have a place in some of these circumstances if practical. Using 1 or 2 wire electric fences that don't stop sheep make mustering sheep a real nightmare and a health and safety issue.</p> <p>The definition of water body needs clarifying – 1 metre wide and 30cm deep is workable, however the PC1 definition is too restrictive, costly, and impractical.</p> <p>The fencing threshold for streams needs to be reduced to 15 degrees from 25 degrees.</p> <p>In deep streams with provided trough water, beef cattle rarely if ever go into the streams. The grazed</p>

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				<p>grass koi carp free creek banks are a sustainable option that doesn't require weed spraying as it would if fenced. Council should fund 50% of fencing.</p>
51	<p>Schedule 1: Requirements for Farm Environment Plans</p>	<p>OPPOSE</p>	<p>Where sub-catchment targets are not included in Table 3.11-1 we seek that the Schedule 1 requirement to produce a Farm Environment Plan does not apply until suitable scientific data has been gathered and targets have been included in Table 3.11-1.</p> <p>Certified Farm Environment Planner should be achievable for farmers who have the necessary qualifications.</p>	<p>This proposal will impose significant costs on our farming activities including not being able to crop on land greater than 15 degrees. Many of the paddocks on hill country farms are sloped because there are limited options available. Crops are important for drought insurance and animal welfare considerations. Direct drilling will be done where possible.</p> <p>The Farm environment plans could possibly cost many thousands to get done which will reduce the amount of actual mitigation that can be achieved. Farmers should be able to write their own plans with training and assistance when required. Nutrient budgets only required on farms with stocking rate over 18su/ha and if nitrogen is an issue.</p> <p>Farmers will listen to other farmers more being told from someone who doesn't understand the fundamentals of farming hill country. This is essential to getting farmers on board and why a sub catchment approach is powerful in driving change where required.</p>

Appendix 1 Map of Upper Maire creek sub catchment and creek to Lake Whangape and WRC testing site.



Appendix 2 Photos of Maire stream at sub catchment exit, summer and flooded.





Appendix 3: Waterfall that prevents Koi Carp. Koi Carp fish visible in water bottom left, second photo of typical summer stream water quality

