

# 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.

**Important: Save this PDF to your computer before answering.  
If you edit the original form from this webpage, your changes  
will not save. Please check or update your software to allow  
for editing. We recommend Acrobat Reader.**

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

SubForm	PC12016	COVER SHEET	
<b>FOR OFFICE USE ONLY</b>			
		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 <b>Please Note:</b> if you fax your submission, please post or deliver a copy to one of the above addresses
Emailed to	healthyrivers@waikatoregion.govt.nz <b>Please Note:</b> Submissions received by email must contain full contact details.
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: Helen and Ian Bell

Full address: [REDACTED]

Email: [REDACTED]

Phone: [REDACTED] / [REDACTED] Fax: \_\_\_\_\_

WRC - contact details redacted at  
submitters' request 6/04/2020  
See REQ160397

## ADDRESS FOR SERVICE OF SUBMITTER

Full name: Helen and Ian Bell

Address for service of person making submission: [REDACTED]

Email: [REDACTED]

Phone: [REDACTED] / [REDACTED] Fax: \_\_\_\_\_

WRC - contact details redacted at  
submitters' request 6/04/2020  
See REQ160397

## TRADE COMPETITION AND ADVERSE EFFECTS (select appropriate)

- 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:
- adversely effects the environment, and
  - 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.

## **Submission on the proposed Waikato Regional Plan Change 1 from Ian and Helen Bell**

**We would like to present our submissions orally.**

### **Introduction - Bellvue Farm**

Helen and I own a 383ha dairy and forestry farm on State Highway 5, Reporoa. This farm was purchased in 1991. Initially, we milked 600 cows and quickly moved to milking 900 cows through a 40 aside shed. In this initial period, we also planted 70ha of forestry over various parts of the farm that were too steep to graze. In 2001, we built a 60-bail rotary cowshed with GEA automation and put in feed pads and feed storage sheds. We have since installed an in shed feeding system. At this point in time, the farm transitioned to a system 5 operation and for two years 1050 cows were milked, producing over 500000 kg/ms. With only 270ha effective for dairy farming, a large amount of supplement was used. In subsequent years, the price of feed became unpredictable and expensive due to an increasing number of dairy farmers supplementing their cows. As such, we decreased cow numbers to 900 cows and have over time decreased to 700-750 cows.

Presently we are running a system 3-4. We have 120ha set up with effluent irrigation from two pumps and two travelling irrigators. Presently we are milking 580 cows and have secured a Miraka winter milk contract and have purchased 150 cows and heifers that are calving now.

Over the past 4 years, we have been pursuing a more grass based system in keeping with our environmentally sustainable vision. Urea is applied as a liquid with Progibb from late autumn to early spring. This year we are trialling 10ha of fodder beet. Little Phosphate and Potash has been used over the past 8 years as we have been reluctant to use acidic fertilizer. For the past 2 years, we have been gradually changing our breed of cows from big Holstein Friesians to a smaller Kiwi bred Friesian and Friesian cross cow that are more efficient converters of grass. Our NRP is below average at 32. Our next project is to upgrade our effluent storage system by lining the ponds and separating the solids from the liquid.

Future plans: Because two of our children are returning to the farm, we have secured a winter milk contract to make our business more viable and to facilitate a succession plan

---

We support the following submission that has been lodged by Federated Farmers. They are as follows:

- 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 the 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 Environmental 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 catchment levels.

We are concerned about the implications all of this will have for our property and for our current activity as described above. We set out my concerns more specifically below.

---

### **Submission Point: Schedule B – Nitrogen Reference Point**

Helen and I are opposed to this Nitrogen Reference Point (NRP) rule for the following reasons

- 1) The two reference/grand-parenting years promoted being 2014/2015 and 2015/16 are too narrow a time frame to make a fair reference point. In these chosen years, dairy farmers experienced the lowest payout in recent times. A great proportion of farmers were farming at a loss. To mitigate the low payout, most farmers de-stocked cow numbers and /or stocking rate to cut costs. As such, the nitrogen usage would be lower than usual. This then makes the NRP taken and the subsequent stocking rate applied unreasonable and unfair.

Bellvue Farm fell into this scenario. In late May, 2014, 160 of our Friesian replacement heifers were sold. We planned to replace them with a different breed of mixed age Friesian cross cows. Unfortunately, by July when we had planned on buying them, the forecast payout was dropping rapidly. This meant that with the forecasted low payout, farmers were de-stocking and selling their low producing cows to reduce their overall costs. In addition, the price of the cows we had hoped to buy, were very expensive. Subsequently, we did not buy any cows at all during this time, and ended up milking only of 485 cows. Therefore this 2014/15 year, we have now been benchmarked with a historic low number of 485 cows given our 8-year average of over 700 cows. Because of this, we now have also been benchmarked on our nitrogen usage and NRP as well.

- 2) Overseer computer model used to make these NRP on farms is largely inaccurate. D, Edmeades states that the available information from the Overseer model for Nitrate Leaching has a range of error for "Type A of -40% to +60%. Type B errors are in the range of -/+30%." (Edmeades, 2013). In addition, farming systems continually evolve in response to a range of factors which are too intricate to model. As such the Overseer model is not indicative of the real-life farming

practices. It only portrays a limited simulation and the modelled estimate has a large margin of error.

- 3) Reducing the high dairy farmer users of nitrogen to 75% NRP and capping all other dairy farmer users at current levels is not a fair outcome for many dairy farmers. High dairy farmer users of nitrogen with a reduction of 75% are likely not to meet the average NRP. Miraka suppliers average NRP is 50. As such they are benefiting from bad farming practices because they will now have a higher NRP compared to others in similar situations. It also puts a cap and sinking lid on farmers who already have low NRP rates due good farming practices.

Bellvue Farm is a case in point. Regarding, good farming practices, The Bellvue farm and 20 other dairy farmers in the Reporoa area formed the Tomorrow Farms Today group (TFT). The aim of this TFT group was to front foot envisaged N usage restrictions. We experimented with various scenarios to reduce nitrogen usage to find the best result that was economically and environmentally sustainable. We all took part in the project as we believed that any future nitrogen limits would be based on district averages. However, we now find our positive efforts in reducing our NRP levels will be limiting to us in the future. Good farming practices have been punished rather than rewarded.

- 4) The proposed NRP capping policy will have a direct effect on the value of the farm. Those dairy farmers who have a low NRP due to the reference years or good farming practice, means that these farmers have no room to further the farms economic potential. Nitrogen levels and land value are intrinsically entwined. The policy needs to be carefully considered and the science used needs to be well founded or there will be adverse effects on farming families, succession planning and farm values.

### **Solution: Schedule B – Nitrogen Reference Point**

- 1) It would be fairer if the reference years were encompassing somewhere between 6 and 10 years.
- 2) Farming policy makers need to understand that Overseers present NRP calculations should be used as a guide given the associated range of errors. As a real-life measurement of NRP are inaccurate, then the Overseers model should not be the basis of regulations being imposed on the farming community. More trails and tests need to be performed before implementing the policy.
- 3) The solution is that all dairy farmers could have a 3-year target NRP of 50 (Miraka District average). This may then be gradually decreased over time to an achievable and still profitable level. This then takes out any anomalies and unfairness in the policy. Capping all farmers NRP and enforcing a 75% reduction rule to high dairy farmer users of Nitrogen is not fair for many farmers. It would be better to apply an all-encompassing NRP reduction to all dairy farmers. Using

district averages with a larger sample of farms gives a fairer result and removes anomalies and extremes.

- 4) The NRP must at a level which enables farms economically sustainable so that land values are not compromised.
- 

#### **Submission Point: Schedule A – Registration (date of notification)**

We have concerns about the date of notification for stocking rates. On this date, the 22<sup>nd</sup> of October 2016, we were milking 580 cows and planned to and subsequently brought 150 cows to fulfill a newly obtained winter milk contract. This date has capped our stocking rate to a low number which is below our average of around 700 – 750 cows. We consider this is unfair.

#### **Solution: Schedule A – Registration (date of notification)**

The date of notification needs to be more flexible or tied to the end of the farming season to allow farmers to cope with changes in circumstances.

---

#### **Submission Point: Schedule C – Stock Exclusion**

The fencing of streams and setback margins we understand and agree with, although there are sometimes anomalies as on our farm. The Kawahanui Stream that meanders for 2kms through our farm is entirely fenced off and a proper concrete culvert/ bridge gives us access to the other side. However, in one part it cuts off some 9ha on its own. 6.5 ha of this is flat and we now have Lucerne there which we cut and carry to avoid cows crossing the stream. The one paddock which is suitable only for grazing we graze probably 12 times in a year. To put a bridge in is problematic as the cost is \$60000-\$80,000.

#### **Solution: Schedule C – Stock Exclusion**

Allow farmers to continue the current policy which enables cows to cross the river once per month. Farmers under special circumstances may appeal this.

---

#### **Submission Point: Rule 3.11.5.2 – Permitted Activity Rule**

The choice of 15 degrees as the maximum slope allowable for full cultivation is impractical. Most of the dairy farms are on land that is generally 15 degrees or over.

**Solution: Rule 3.11.5.2 – Permitted Activity Rule**

It would be more practical to choose a steeper slope of 25 - 30 degrees.

---

**Submission Point: Rule 3.11.5.7 – Non-Complying Activity Rule – Land Use Change**

The concept of ring fencing existing land use and not enabling farmers to be more flexible in their land use, is very restrictive. The opportunity to grow your business is what drives every business. For many farmers that may be adding some adjacent land. For some families that have left converting their farms for various reasons and now may wish to do so to enable family members to come on board will now be unable to. In addition, the future is unpredictable and as such, restrictive rules will have adverse effects on the New Zealand agriculture sector. To be locked in to one type of land use type may in time become an issue. By this I mean the loss of flexibility to change in the face of economic roadblocks that may necessitate a complete or part change to your system of farming. This land use change goes far beyond the scope of Healthy Rivers.

**Solution: Rule 3.11.5.7 – Non-Complying Activity Rule – Land Use Change**

We oppose the land use change rule.

---

**Overall Proposal**

There needs to be an avenue for farmers to work through in circumstances where PC1 have forced unfair restrictions on their business. Farmers need to be able to present their case and have rules modified if they are unfair or unsustainable.

---

**Conclusion**

In conclusion PC1 has gone far beyond what we understood at the collaborate stakeholder meeting. If not modified it will have a huge effect on our business, our ability to include family members on our farm and land values.

Comprehensive and well-founded science is required in dealing with this issue. Contamination points need to be identified along the river and farmers to be given guidance and assistance in resolving the issues. A one size fits all approach for all farmers is inefficient, costly and less likely to succeed. Much work also needs to be done in relation to dam flow, urban areas need to look at their storm water and sewage treatment issues. Healthy Rivers are a national issue and nationwide solutions need to be sought.

Thank you for your consideration.

---

### **References**

Edmeades, D., 2013. *Statement of evidence of Douglas Charles Edmeades on Behalf of Canterbury Pastoral Ltd.*. Canterbury: Canterbury Pastoral Limited.

**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:

*G. Bell*  
~~*G. Bell*~~

Date:

*07/03/2017*  
*07/03/2017*

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.