

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

SubForm	PC12016	COVER SHEET	
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		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 by email must contain full contact details.</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: John Atkinson
 Full address: 1211 Waikite Valley Road, RD1, Rotorua
 Email: jandsatkinson@gmail.com
 Phone: 0274130520 Fax: _____

ADDRESS FOR SERVICE OF SUBMITTER

Full name: _____
 Address for service of person making submission: _____

 Email: _____
 Phone: _____ Fax: _____

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:
- (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.

THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO

Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1 (Continue on separate sheet(s) if necessary).

Page 42 Rule 3.11.5.4

Page 45 Rule 3.11.5.7

Page 47 Schedule B NRP

Page 52 Schedule 1 – Requirements for Farm environment plans

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

(Select as appropriate and continue on separate sheet(s) if necessary).

- Support the above provisions
- Support the above provision with amendments
- Oppose the above provisions

MY SUBMISSION IS THAT

Tell us the reasons why you support or oppose or wish to have the specific provisions amended. (Please continue on separate sheet(s) if necessary).

Background

My wife and I own two properties in the Upper Waikato – a 118ha dairy farm milking 335 cows in the upper Waikato River FMU Otomakokore Sub Catchment (Priority 2), and a 40ha dairy support unit in the upper Waikato River FMU Ohakuri sub catchment (Priority 3).

Our two blocks were not 'inherited family farms' and look approximately 20 years of hard work to acquire. Having achieved ownership through the sharemilking system ourselves we now employ a 50/50 sharemilker, and in the past, lower order sharemilkers. (Many farm owners these days seem reluctant to have 50/50 – we feel, though, this system is vital to the NZ dream of starting with very little and being able to achieve farm ownership). Currently I manage the support farm and the 50/50 sharemilker manages the dairy farm with the assistance of a full time labour unit.

Our farm size is relatively small. To make the most of the land we have adopted a more intensive system. However we understand how more intensive dairying can be detrimental to the land when badly managed. We contend our management practices are such that any detrimental effects are mitigated as much as possible. 6.6 ha (5.6 %) of our farm is pine tree plantations (on land we deem unsuitable for dairying contour wise). There are also numerous plantings of hedges, poplars, willows and gum trees for farm and livestock shelter. We have fenced off the wetland area and planted in flaxes. Our effluent is spread over 30ha or 27 % of the farm- a lot larger % than for many farms. We have invested in calibrated (computerised) fertiliser measuring, spreading and spraying equipment to ensure accurate placement of fertiliser. We have recently moved away from solely using NPK based fertilisers to using calcium and magnesium fertilisers with the added required trace elements.

I SEEK THE FOLLOWING DECISION BY COUNCIL

(Select as appropriate and continue on separate sheet(s) if necessary).

- Accept the above provision
- Accept the above provision with amendments as outlined
- Decline the above provision
- If not declined, then amend the above provision as outlined

ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION

Section number of the Plan Change: Page 42 Rule 3.11.5.4

Do you support or oppose the provision?

Support

Oppose

Submission

State in summary the nature of your submission and the reasons for it.

Hopefully Fonterra sustainable advisors will be certified under the industry scheme. If not it is questionable whether WRC will have sufficient certified advisors to carry out FEPs (What cost will it be to ratepayers to train and employ enough advisors?). Our farm will probably fall in the 75th percentile of NRPs. Overseer was not designed to be used quantitatively to give absolute numbers of N leaching. It has not been referenced to all the different soil types and different rainfalls particularly in the Upper Waikato. Too many assumptions are made – calculations should be referenced to the sub catchment level. We use N fertiliser judiciously. It is applied when holes in the feed budget become apparent rather than as a matter of course. It is not used in very wet conditions or very dry conditions. Only N coated with Agrotain is used – to keep volatilisation and leaching losses to a minimum. Total N usage has been decreased by combining with a growth promoter in gibberellic acid. Three years ago we purchased for our own farm a system used by most if not all registered fertiliser . . .

Decision Sought

State clearly the decision and/or suggested changes you want Council to make on the provision.

. . .spreading contractors. The system utilises computerised spreading machinery and a software system incorporating GPS. This ensures an accurate spreading rate and proof of placement. Data is then stored electronically.

Change as suggested by Federated Farmers

Section number of the Plan Change: Page 45 Rule 3.11.5.7

Do you support or oppose the provision?

Support

Oppose

Submission

State in summary the nature of your submission and the reasons for it.

Will impact on our proposed small expansion. Our dairy farm is smaller than the average dairy farm in our area and the purchase of the neighbour's 19ha drystock block adjoining us would enhance the economic viability of our small farm. However, under PC1 we would be limited to the new block's NRP which would then make it uneconomic to use for dairying. It is gently rolling land that is ideally suited to dairying and would be easily incorporated into our dairy farm. (Ironically prior to 2014/15 this block of land was dairied on, before being subdivided off an existing dairy farm). Preceding the recent downturn in the dairy industry the dairy farm was run under a 'system 4' ie feed imported from support unit plus palm kernel extract fed, and young stock grazed on the support unit. Production was 164000 kg m/s (ie 496kg per cow (1500 per ha) – the BOP average at the time was approx 350/cow and 1040 per ha.). With the dramatic payout drop we changed to a 'system 2' and experimented with . . .

Decision Sought

State clearly the decision and/or suggested changes you want Council to make on the provision.

. . .once a day milking, to reduce costs. Feed imported dropped from 493 tonne to 253 tonne. Nitrogen RP reduced from 71 to 55kg/ha, and production from 164000 to 123,500. Our NRP in 2014/15 was 71.

Change as suggested by Federated Farmers

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: jandsatkinson@gmail.com

Date: 7 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.

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.

ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION

Section number of the Plan Change: Page 47 Schedule B NRP

Do you support or oppose the provision?

Support Oppose

Submission

Decision Sought

State in summary the nature of your submission and the reasons for it.

State clearly the decision and/or suggested changes you want Council to make on the provision.

By changing 'systems' from 4 to 2 and reducing feed inputs and N used our NRP dropped to 55. This had a huge effect on net income. Production dropped 40000kgs. At a \$4 payout that equated to \$160000 With a payout returning to \$6 it is economic again to import feed. Any NRP restriction will obviously compromise this. We are not averse to managing Nitrogen input even more closely – if it could be scientifically proven that it is Nitrogen which is causing the water quality issue. Our understanding is the Waikato River is phosphate limited. Overseer was not developed to quantitatively assess N leaching, only to give direction of change for different management practices. Eg stocking rate, fertiliser inputs, feed imports or long term N leaching on a given farm on a given soil, with a given rainfall ie direction of change for different scenarios. It also only has an accuracy of + or – 30%, ie if NRP is set at 30 actual numbers could be between 20 - 40. . .

. . . Low end emitters ie low NRPs will be trapped in their current management system. Their price of land will be forced down as they will not be able to increase production without huge mitigation costs. Discharges are better managed through best or good management practices. Farmers should be able to have their actual N losses measured not quantitatively assessed by a computer programme. The NRP restrictions will also affect farmer's ability to employ labour. Under NRP restrictions our sharemilker may face having to reduce the herd size to 250 cows rendering it uneconomic to employ a labour unit. Labour unit reductions have consequences not just on a personal (family life) level but also on a community (reduced school roles -> reduced school staffing) level. There needs to be a balance between environmental, social, cultural and especially economic outcomes for Plan Change 1 as laid out in the RMA. Change as suggested by Federated Farmers

Section number of the Plan Change: Page 52 Schedule 1 – Requirements for Farm environment plans

Do you support or oppose the provision?

Support Oppose

Submission

Decision Sought

State in summary the nature of your submission and the reasons for it.

State clearly the decision and/or suggested changes you want Council to make on the provision.

Adverse affects of cultivation on slopes of less than 15degrees:
The concern relating to slope cultivation is runoff into waterways. We have only one drain/wet area which is dry 50% of the time. Cropping is not done near this area. Our cropping programme, latterly fodder beet, requires full cultivation to provide high quality dry matter for winter months. In extreme rainfall events cultivated land, if crops or grass have not reached ground cover, will run. The runoff does not leave our property. If excessive, the topsoil is returned mechanically. Our cropping programme is vital to our winter feeding and results in huge gains in dry matter production when those paddocks are returned to pasture. We are also moving away from mono cultures of traditional ryegrass and clover to fruit salad type mixes (chicory, plantain, fescue, red and white clovers, ryegrass etc). The resulting mix is a deep rooting pasture that can use soil nutrients at a deeper level, particularly N). Another shortcoming of Overseer is it is not programmed . . .

. . .to cope with such a species mix when calculating the NRP.
The 5 metre setback:
Lowland /wet farms with multiple drains with a projected 5 metre setback will result in large losses of productive land. This will ultimately only grow blackberry and other weeds unless planted with appropriate species eg natives at a huge initial outlay and ongoing maintenance cost, spraying and release cost – presumably borne by farmers. There needs to be rates relief for this land, and contributions made by local and regional councils for these costs. Plan Change 1 will result in locking land into particular production uses denying owners the chance to respond if market forces ie economics indicate the need for a change.

Change as suggested by Federated Farmers