

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.

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|----------------------------|---------|-------------------|--|
| 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 my 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 | | |
|--|---------------------|-----|
| Full name: John Liefing | | |
| Full address: 288 Tramway Road, Puni, RD3, Pukekohe 2678 | | |
| Email: John.Liefing@opus.co.nz | Phone: 0274 873 671 | Fax |

| ADDRESS FOR SERVICE OF SUBMITTER | | |
|---|---------------------|-----|
| Full name: John Liefing | | |
| Address for service of person making submission: P O Box 248, Pukekohe 2340 | | |
| Email: John.Liefing@opus.co.nz | Phone: 0274 873 671 | Fax |

| 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. |
| <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: 8 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

I am involved in managing a 51.9 hectare farm at 288 Tramway Road, Puni, Pukekohe which is owned by my mother, CJ Liefing. The farming activity is currently the grazing of beef cattle and sheep. The farm is located in Sub Catchment 6 in the Lower Waikato River Freshwater Management Unit which is listed in Plan Change 1 as Priority 2.

The stocking rates are variable but it is currently around 4 stock units per hectare. No stock food is brought into the farm. The stocking rates vary according to factors such as the supply of fresh grass, soil condition, weather patterns and market forces.

There are approximately 3 kilometres of waterways on this farm. This is high for a farm of this size.

The outcome of Plan Change 1 will adversely affect the future operation of this farm. The cost of the fencing, farm structures, consultants and compliance to meet the requirements of this plan change may result in the farm being not economic to operate. This will have a significant social and emotional effect on the owner of this farm and those involved in operating it.

I am concerned about the following issues with Plan Change 1 based primarily on costs and practicalities of meeting the requirements of the plan on a small holding.

I support the submission that has been lodged by Federated Farmers. I am particularly concerned about the following aspects of Plan Change 1:

- The significant negative effect on rural communities including the social effect of small farms being sold for economic reasons.
- The cost and practicality of the rules.
- The effect that the Nitrogen Reference Point will have on this farm and the economic wellbeing of the farm owner.
- The Farm Environment plan requirements leading to 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 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 am concerned about the implications all of this will have for our property and for the current activities as described above. I 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. | OPPOSE | Amend Clause 4c of 3.11.5.2 to take into account factors such as proximity of steep land to water bodies, stocking rates, fertiliser use on such land. | <p>It is too restrictive for smaller farms with a high proportion of steep land when all land steeper than 15 degrees slope is to be excluded from grazing. This could make the farming enterprise economically not viable and force farmers off the land. The value of such properties will decline due to the restrictive nature of this clause.</p> <p>On our farm this clause will result in retiring perhaps more than 10% of the land. Already there could be around 10% of the farm taken out of production due to the need to exclude stock from around waterways and wetland areas.</p> <p>The reduced farm income resulting from loss of grazing area and the costs associated with complying with this plan change will significantly alter the economic viability of operating this farm. This may result in this farming operation to cease as it will increase the costs beyond what the farm can bear.</p> |
| 42 | Rule 3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme | OPPOSE | Amend 3.11.5.4 as requested by Federated Farmers in their submission. | <p>This proposal will impose significant costs on our farming activities including the costs and timeframes with complying with the requirements of this plan change.</p> <p>The costs associated with complying with this plan change can financially cripple the operation of this farm.</p> |

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|---------|---|-------------------|---|---|
| 46 | Schedule A: Registration with Waikato Regional Council. | OPPOSE | Clause 5f should state that it is the maximum intended stocking rate and not the stocking rate at the time of registration. | It is not clear from this clause whether it is the maximum stocking rate of the farm or the stocking rate at time of registration. Stocking rates can vary throughout the year and even from year to year. |
| 47 | Schedule B: Nitrogen Reference point | OPPOSE | Amend Schedule B as requested by Federated Farmers in their submission. | <p>This proposal can impose significant costs and restrictions on our farming activities. We have not applied fertiliser for a number of years which could adversely affect the Nitrogen Reference Point if fertiliser is to be applied in future.</p> <p>Is the OVERSEER® Model (or any of the other approved models) sufficiently reliable to use in this application? Should not also the attenuation of nitrogen be considered through natural processes such as denitrification, absorption of clay colloids, ammonification, etc.? Do any of the models include this?</p> <p>The costs associated with complying with this may result in this farming operation to cease as it will increase the costs beyond what the farm can bear.</p> |
| 50 | Schedule C: Stock | OPPOSE | Amend Schedule C as requested by | This proposal will impose significant costs on our farming activities including the construction cost and |

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|----------------|---|--------------------------|---|---|
| | Exclusion | | Federated Farmers in their submission. | <p>maintenance cost of the fencing and any planting. We have three streams and a number of tributaries passing through the farm. The costs associated with complying with this rule will result in this farm being uneconomic to operate especially under the timeframes specified. A longer timeframe may assist. The value of the property to future owners will therefore decrease.</p> <p>To practically meet these requirements could result in around 10% of the land area being taken out of production.</p> <p>Controlling weeds such as gorse, ragwort, woolly nightshade and thistles in areas which have been fenced off from stock will add to the cost of farming. Weed control in areas of long grass is far more difficult than in grazed areas. This could result in weed control being minimised which is not desirable after diligently controlling the weeds for 57 years. Over that period the area of gorse has reduced significantly due to annual control of it.</p> <p>The costs associated with complying with this may result in this farming operation to cease as it will increase the costs beyond what the farm can bear.</p> |
| 51 | Schedule 1: Requirements for Farm Environment Plans | OPPOSE | Amend Schedule 1 as requested by Federated Farmers in their submission. | <p>This need to comply with this proposal will impose significant costs on the farming activities.</p> <p>The costs associated with complying with this may result in this farming operation to cease as it will increase the costs beyond what the farm can bear. This will have a significant social and emotional effect on the owner of this farm and those involved in operating it.</p> |