

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

YOUR NAME AND CONTACT DETAILS		
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Full name Stacey Leigh		
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PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION
<input checked="" type="checkbox"/> 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 Stacey Leigh, electronically sent

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

Our family owns a 650 hectare sheep and beef hill country property and lease an adjacent 150 hectare farm in the Priority 1 lower Waikato River Riverine lake FMU. The 650ha farm has 8km of main creek which turns into the Maire creek. We run a mixture of Angus breeding cows, Friesian bulls and Coopworth ewes in a sustainable manner. As two of the properties have been recently added to the original farm, a programme of increasing stocking rates on these properties from a very low base has been ongoing for 5 years. Our family have been farming this land since 1920.

We have a low environmental footprint with moderate stocking rate for our hill country with plenty of room for improvement. As the income from traditional farming cows and sheep has been low for many years, diversion into more intensively farmed Friesian bulls has allowed cash for a reticulation scheme (on going) and fencing of bush and waterways where practicable. This is a long term project financed out of income and has been assisted from recently high beef returns. We are unsure how long this will last.

The farm is at the base of the upper Maire creek sub catchment (see separate community submission) and as such we live in a high flood zone in which the flood can rise many metres in a matter of hours with heavy rain. These violent and high floods take out any light fences in it's path and any riparian planting is ripped out and dragged downstream. Permanent pasture is not eroded on the creek banks (see photos appendix 2 and 4) and because our creek is deep with non-stony base, cattle rarely ever stand it in (see Appendix 5). The advantage of these sustainable grassy creek banks is they negate the need for fencing or week spraying.

We feel that grazed streams are very sustainable and also restrict damage to the creek from flood damage. We are very fortunate in that the koi carp cannot climb the waterfall past our boundary (Appendix 3) and so our water is swimmable and fishable year round (apart from when it floods).

In the future, we plan to continue to gradually increase our stocking rate as the land develops and allows and continue to expand the water reticulation scheme and fencing of waterways and bush. In our near 100 years of tenure we strongly believe that it is one of the most sustainable methods of food production on our planet.

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's length). (see 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 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.

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. Early monitoring of the exiting stream from our farm indicates water quality is excellent.

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

- The significant negative effect on our rural communities with some being forced to sell to wealthy city dwellers or foreign buyers with no knowledge of farming in this unique area
- The cost and practicality of the rules on our business. This will limit our ability to borrow and with service current debt whilst reducing our equity in the business

- The effect that the Nitrogen Reference Point will have on our business and our economic wellbeing. Without being able to slowly and sustainably increase the business so greater income is generated for projects, the point of owning land is largely negated. A return on capital of 1% is all that can be expected on hill country farms, we would all be better off with money in the bank. Will hill country farmers continue to do it and what do rural communities look like if they don't?
- The Farm Environment plan threatens to be unreasonably expensive for what it is trying to achieve and is at risk in creating a negative environment for farmers to work in, not positive.
- 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 and stock exclusion of water bodies which are unscientific, unlikely to have a benefit on our pristine water and are too short and unachievable
- The plan significantly exceeding the 10 year targets in many attributes and areas such as ours
- The lack of science and monitoring at the sub catchments level

We support the overall vision for our waterways but the blanket rules favour the intensive farmers and towns with high levels of contaminates and is unfair on the lower earning extensive hill country drystock farmers that contribute much less contaminants into the waterways.

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

We are concerned about the implications all of this will have for our property and for our current activities as described above. We 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	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>No Nitrogen reference point</p> <p>Water exclusion less than 15 degrees except in high flood zones where other mitigation necessary eg 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. More testing required.</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 same requirements.</p>

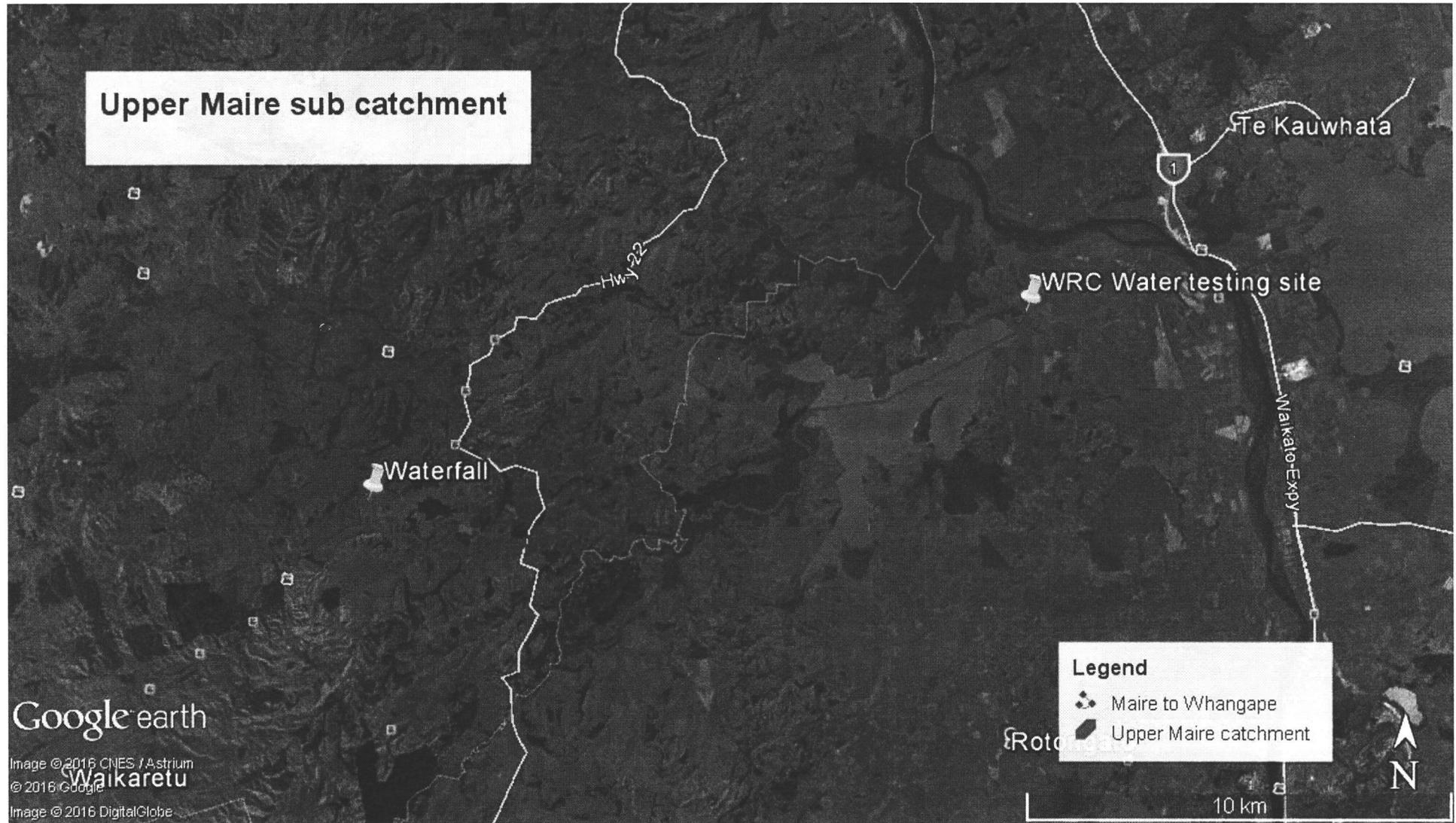
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				<p>Consideration needs to be given to the level of water quality improvement needed in the sub catchment.</p>
42	<p>Rule 3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme</p>	<p>OPPOSE</p>	<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>

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45	Rule 3.11.5.7 Non-Complying Activity Rule – Land Use Change	OPPOSE	This rule needs to be amended so not to restrict practical alternatives. Housing is expanding onto vegetable growing land. Either prevent the spread of housing or allow land that could be used for cropping to be used for that purpose, regardless of it's current land use.	<p>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.</p> <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 set date should be mid winter, 30 June, as this is the lowest stocking point.</p> <p>Water bodies in schedule C needs clarifying and should 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 which will create a larger environmental effect.</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>Overseer only used on sub catchments with a nitrogen issue.</p> <p>No WRC water testing in our sub catchment</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 is not an issue with hill country farms. Neither are the other contaminants in our extensive</p>

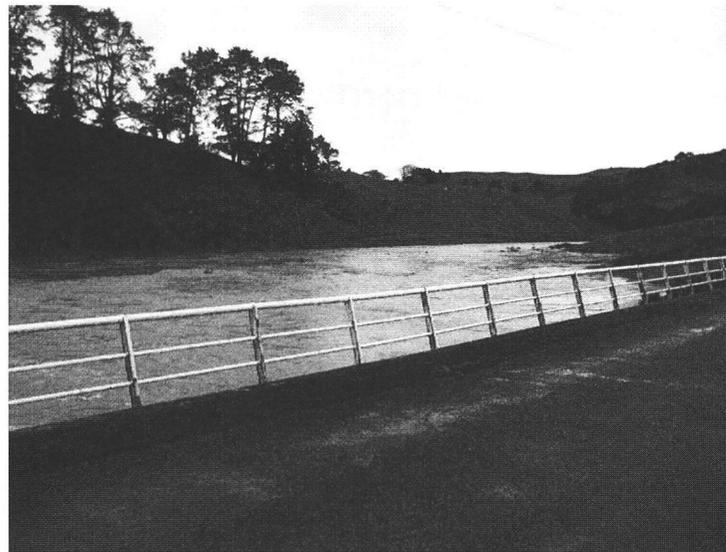
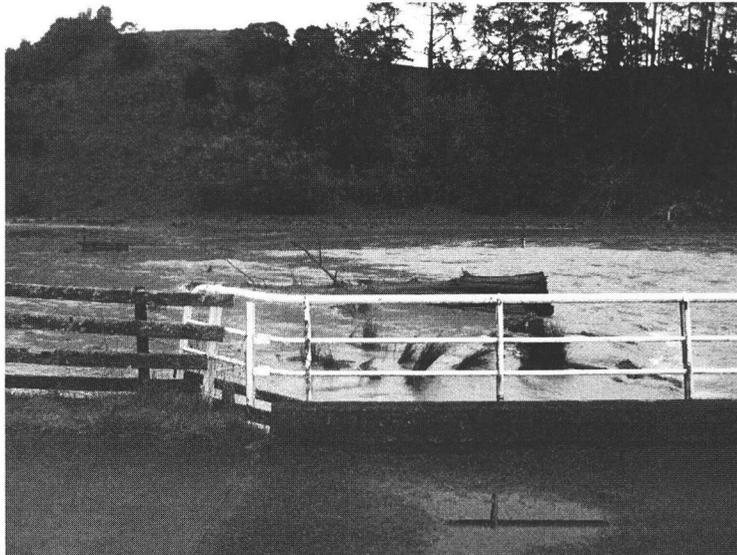
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				<p>operations. More testing and science required in upper catchments.</p> <p>We are also concerned that this is not practical because this will be difficult to monitor and enforce. How these are managed is surely more important. What about farms that have been low stocked for whatever reason in 2014/15 and 15/16 We don't believe Overseer was designed to be a regulatory tool, certainly not on hill country farms with our soil types. It should only be used in sub catchments with high Nitrogen leaching.</p>
50	Schedule C: Stock Exclusion	OPPOSE	<p>We suggest that the schedule is amended to include "best practicable option" as an alternative to fencing of all waterways.</p> <p>Water bodies in schedule C needs clarifying and should follow national guidelines, 1m wide, 30cm deep.</p>	<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. 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. 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. The definition of water body needs clarifying – 1 metre wide and 30cm deep is workable, however the PC1</p>

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				<p>definition is too restrictive, costly, and impractical. The fencing threshold for streams needs to be reduced to 15 degrees from 25 degrees. 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 propose 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>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 performed on the hill country farms in our upper catchment show very little environmental impact and therefore will have very little effect on the water quality. It should only be used in sub catchments with an issue with Nitrogen</p>

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



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

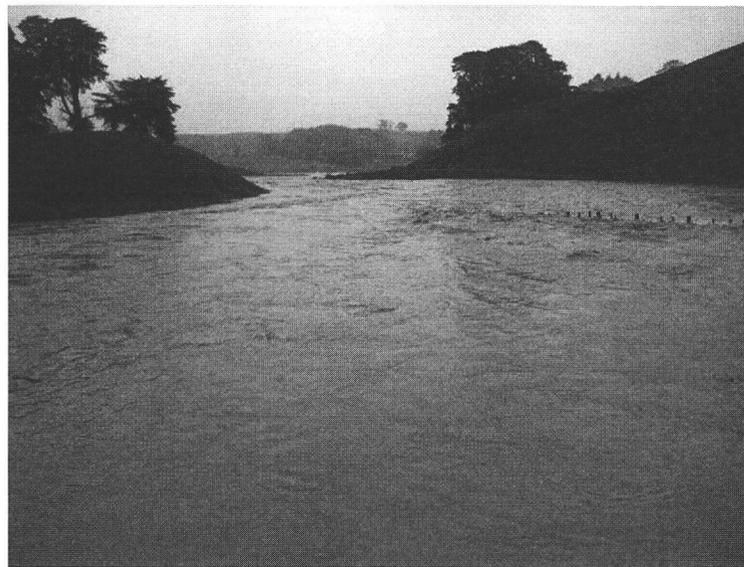




Appendix 3 Waterfall that prevents Koi Carp. Koi Carp fish visible in water bottom left, second photo of water quality



Appendix 4 Photos of farm access summer and flooded



Appendix 5 Photos of sustainable creek quality unfenced, lower photos in intensive beef system. Note no cattle damage

