

# 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       |  |
| <b>FOR OFFICE USE ONLY</b> |         |                   |  |
|                            |         | Submission Number |  |
| Entered                    |         | Initials          |  |
| File Ref                   |         | Sheet 1 of        |  |

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

| SUBMISSIONS CAN BE  |  |
|---|--|
| <b>Mailed to</b>  | Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240   |
| <b>Delivered to</b>   | Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton   |
| <b>Faxed to</b>   | (07) 859 0998 <i>Please Note: if you fax your submission, please post or deliver a copy also</i>   |
| <b>Emailed to</b>   | <a href="mailto:healthyrivers@waikatoregion.govt.nz">healthyrivers@waikatoregion.govt.nz</a><br><i>Please Note: Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.</i> |
| <b>Online at</b>  | <a href="http://www.waikatoregion.govt.nz/healthyrivers">www.waikatoregion.govt.nz/healthyrivers</a>   |
| <b>We need to receive your submission by 5pm, 8 March 2017.</b> |  |

| YOUR NAME AND CONTACT DETAILS  |                          |                        |
|--|--------------------------|------------------------|
| Full name Lindy & Michael Bennett  |                          |                        |
| Full address 166 Kakepuku Road, RD3, Te Awamutu  |                          |                        |
| Email <a href="mailto:Michael_bennett@xtra.co.nz">Michael_bennett@xtra.co.nz</a><br><a href="mailto:lindy_pop@yahoo.co.nz">lindy_pop@yahoo.co.nz</a> | Phone 0275481277 Michael | Phone 0273245447 Lindy |

| ADDRESS FOR SERVICE OF SUBMITTER                |       |     |
|---|-------|-----|
| Full name                                       |       |     |
| Address for service of person making submission |       |     |
| Email   | Phone | Fax |

| 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**

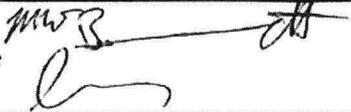
**OF**

**SUBMITTER**

*(or person authorised to sign on behalf of submitter)*

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

Signature

A handwritten signature in black ink, appearing to be 'MWR' followed by a flourish.

Date 8-3-17

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**

Two and a half years ago we went from 50:50 sharemilkers and entered into an equity partnership with the existing farm owners and their daughter and son-in-law. We are currently 30% equity owners of a 131ha dairy farm milking 470 cows. Our debt levels are considerably high and the last two years the payout has been low, and meant considerable financial pressures to attempt to service this debt.

We run a stocking rate of 3.7cows/ha, system 2-3 farm, with young stock grazed off farm, nitrogen reference point 50 – 52kgN/ha/year. Environmental projects to date include fencing off waterways at a cost of \$2000. Recently races have been upgraded to avoid run off from races entering the waterway. Riparian planting has begun.

We are in support of the general thrust of the Plan Change 1 and the Vision and Strategy for the Waikato and Waipa Rivers. We are however concerned about the following issues with PC1:

- The costs of developing and implementing a farm environment plan, and the implementation of the mitigations.
- The potential implications of reducing our nitrogen reference point and still being an economic farming unit, able to service debt.
- The potential devalue of land that can potentially no longer be grazed
- The fact we use strip tillage to grow our maize and this is not recognised as a minimum cultivation practice.
- We farm predominantly ash soils, and to avoid the necessity to cultivate in the spring, we have adopted 'best practice management' when growing chicory; spraying out in the autumn, then direct drilling annual grass, spraying the annual grass out in the spring, and direct drilling chicory.

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

- 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 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

We wish to be heard at the Hearing.

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 our concerns more specifically in the table below.

**SUBMISSION POINTS: Specific comments**

| Page No | Reference<br>(e.g. Policy, or Rule number)                                  | Support or Oppose | Decision sought<br>Say what changes to Plan Change 1 you would like                               | Give Reasons   |
|---------|---|-------------------|---|--|
| 40      | Rule 3.11.5.2 4 c.<br>Permitted Activity Rule –<br>Other farming activities | Oppose in part    | We submit to amend 'non grazing of land over 15 degrees' within a certain distance of a waterway. | <p>We accept that sediment movement from grazed land is an environmental risk. Soil losses also have a direct economic cost to the farm, however a rule preventing grazing on slopes exceeding 15 degrees is impractical because:</p> <ol style="list-style-type: none"> <li>1. The risk of contaminating water ways with sediment is more strongly related to the distance between cultivated land and the receiving water way than the slope of the land.</li> </ol> <p>20ha of our farm would be excluded from grazing as it is over 15 degrees, including paddocks that are 960m from the nearest waterway. This is a substantial area and potentially this area will be devalued which is significant to the economics of our business, given the debt owing on the land.</p> |
| 40      | Rule 3.11.5.2 4 d.<br>Permitted Activity Rule –<br>Other farming activities | Oppose in part    | We submit to remove annual grass from this rule.  | <p>We are very conscious of the need to reduce erosion and to retain organic matter and no longer cultivate soils when re-grassing paddocks. We have adopted 'best practice management' to establish our chicory in spring, in order to avoid cultivation, consisting of a double spray programme. Spraying out in the Autumn, then direct drilling annual grass, the spraying the annual grass out in the spring and direct drilling chicory. Firstly if we were unable to utilise the annual grass by way of grazing, it would be uneconomic to grow it. Secondly, if we were to only spray out in the spring, cultivation of some sort would undoubtedly be considered.</p>   |

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|---------|--|-------------------|---|--|
| 42      | Rule 3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme | Oppose in part    | Amend 3.11.5.4 as requested by Federated Farmers in their submission.   | This proposal will impose significant costs on our farming activities. The potential costs for a Nitrogen Reference point (NRP) and a Farm Environment Plan (FEP) was highlighted in a recent report commissioned by WRC and carried out by FAR. The cost of the report and then implementing the required mitigations was put at somewhere between \$60-\$100/ha. \$7860 – 13,100 for our farm. We already have a high level of debt, so these added costs are not appreciated. |
| 47      | Schedule B: Nitrogen Reference point   | Oppose in part    | Amend Schedule B as requested by Federated Farmers in their submission. | We are concerned that farms with a low NRP number will be negatively impacted in terms of the land-value of these farms. We feel that it is unfair if properties which have been sustainably managed will be worth less to potential buyers compared with farms with high NRP.   |

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| 51      | Schedule 1: Requirements for Farm Environment Plans | <b>OPPOSE</b>     | <p>Amend Schedule 1</p> <p>We support the requirement that a Farm Environment Plan shall be certified as meeting the requirements of Schedule A. As an addition to the Schedule 1, we submit that farmers should be able to develop their own plans, either on their own accord or as participants in FEP development workshops.</p> <p>Certification of the FEP can be achieved by having the plan reviewed by a Certified Farm Environment Planner. The review will include a farm visit and an assessment of the identified environmental risks for contaminant losses and the mitigation plan for these risks.</p> | <p>We support the requirement for farm environment plans, they provide an opportunity for farmers to understand the environmental risks on their farms and to develop mitigation strategies to reduce the impact of their farming activities on the environment.</p> <p>If farmers develop their own plans, consistency with the Schedule 1 can be achieved by a certification process whereby the plan is reviewed by a Certified Farm Environment Planner, and the review includes a farm visit and an assessment of the identified environmental risks for contaminant losses and the mitigation plan for these risks.</p> <p>The reasons for this additional provision is to:</p> <ol style="list-style-type: none"> <li>1. Reduce the cost of plan development. Consistency in the quality of the plans will be maintained by the review process. The ongoing costs to remain compliant and audited is an added burden given our high debt levels.</li> <li>2. Reduce the level of dependence and likely pressure on Certified Farm Environmental planners for plan development.</li> </ol> |

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|----------------|---|--------------------------|--|---------------------|
|                |   |                          |  |                     |