

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

Submission Form

Submission on a publically notified proposed Regional Plan prepared under the Resource Management Act 1991.

On: The Waikato Regional Councils proposed Waikato Regional Plan Change 1 - Waikato and Waipa River Catchments

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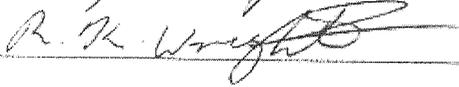
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I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

I wish to be heard in support of this submission.

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

 8/3/17 Signature date

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Introduction

We are a farming business who have been farming hill country in the Matahuru catchment and neighbouring districts for two generations. We farm 1500 hectares and as a family employ 10 people from the local community.

Our association with the area and its catchments and the fact we have been very proactive in managing our environment including the water ways by fencing where needed , water reticulation and sustainable farming practices puts us in a strong position to submit to the Regional Council regarding PC1. We believe and support the concept of Healthy Rivers but believe PC1 in its present state will not achieve and will severely affect our farming community.

"The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following table. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan, including Objectives, Policies, or other rules, or restructuring of the Plan, or parts thereof, to give effect to the relief sought".

PROVISION	OUR SUBMISSION IS THAT	WHY	RELIEF SORT
Objective 1: By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in achievement of the restoration and protection of the 80-year water quality attribute^ targets^ in Table 3.11-1.	SUPPORT BUT PLAN WONT ACHEIVE	PC1 is aiming for a 10% reduction in contaminants in 10 years with a possible rule change following. Therefore there will be no certainty of rules or even the right to farm some catchments beyond 10 years, and yet huge capital investments being asked for.	WITHDRAW AND RECONSULT Identify specific catchment and sub catchment water problems and form landowner catchment committees to address these under Council supervision and support ,base action on individual farm environment plans. All stakeholders including farmers would feel included and get on board. No stakeholder will be comfortable with the uncertainty of rule changes in ten years under current PC1
Objective 2: Waikato and Waipa communities and their economy benefit from the restoration and protection of water quality in the Waikato River catchment, which <u>enables the people and communities to continue to provide for their social, economic and cultural wellbeing</u>	SUPPORT BUT PLAN WONT ACHEIVE	Direct compliance costs( Extensive and expensive hill country fencing) combined with reductions in capital value and farmer equity caused by N cap. Will see Hill country and dry stock farming communities suffer disproportionately due to these costs .Farmers are well represented in the cultural, and social aspects of rural communities and therefore the damage to farming families financial viability due to the capital costs of compliance is not in the interests of our rural communities. Therefore PC1 fails to meet this objective.	WITHDRAW AND RECONSULT

<p>Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens by:</p> <p><u>C. Progressively excluding cattle, horses, deer and pigs from rivers, streams drains, wetlands and lakes.</u></p>	<p>OPPOSE</p>	<p>Oppose section C for low discharge hill country farming activities on the basis that the detriments (social, economic, cultural and environmental) outweigh the environmental benefits. We oppose mandatory fencing in hill country because a) it is financial unviable for the majority of hill country farmers and b) because increased sediment loadings of creeks caused by the benching of lines through construction and stock tracking along fence lines would reduce water quality in our sub-catchments . Mandatory fencing is totally impractical and unachievable for a lot of hill country . We firmly believe educating farmers and landowners promoting reticulated water systems would remove the stocks need to navigate and use the streams. It is proven that stock on water systems do better and in our experience rarely enter the streams or seeps .</p>	<ol style="list-style-type: none"> <li>1. MODIFY to cap mandatory fencing at 15 degrees and per National recommendations.</li> <li>2. Over 15 degrees, other mitigation methods that could be utilized and would be more beneficial both from a cost and an environmental point of view. With Council support landowner education on sustainable farming and grazing practices These include good stock management, grazing leaving larger grass covers. Wetland planting where appropriate. Water Reticulation, retirement of land, as identified through the Farm Environment Plan as critical source areas. All scientifically proven mitigations practical as well as financially viable</li> <li>3. WRC to help fund 50% of all mandatory fencing costs. AS well as financially assist Water Reticulation projects.</li> </ol>
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<p>Schedule 1. Requirements for a Farm Environment Plan</p> <p>2. (a) (ii) <u>"for areas with a slope of 25 degrees and where stream fencing is impractical the provision of alternative mitigations"</u></p>	<p>OPPOSE</p>	<ol style="list-style-type: none"> <li>1. 25 degree fencing cap prohibitively expensive for hill country farmers. Mitigation of every stream &gt;25 degrees also prohibitively expensive. The costs involved would unviable for many hill country farming enterprises to continue.</li> <li>2. 25 degree cap was introduced without any scientific basis any public consultation and without the basic rigour of a cost/benefit analysis. It is aspirational and has massive implications for individual hill country farmers and their communities which were never considered .</li> <li>3. 25 degree cap will cause widespread degradation of stream health in hill country catchments due to increased sedimentation caused by mechanical benching of hills to construct fences and on-going stock tracking along the many new fence lines.</li> <li>4. WRC unable to provide clear guidelines on either what mitigation is required, how much of a stream needs to be under 25 degrees to be categorised as having to be fenced. This is extremely problematic in hill country due to the high variation of topography for each stream.</li> </ol> <p>Mitigation of every individual stream is an unwarranted financial burden for hill country where the majority streams are generally in good health. Instead hill country farmers should focus their resources on the contributing pollution from "critical source areas identified in their Environment Plan</p>	<ol style="list-style-type: none"> <li>1. MODIFY Threshold for mandatory stock exclusion to nationally recommended standard of 15 degrees.</li> <li>2. Establish CLEAR guidelines for what % of the length of a stream section must be under 15 degrees o qualify for mandatory fencing – suggest 90%.</li> <li>3. Accept that fencing required above the 15 degree threshold for intensive farming operation (&gt;18su/ha). eg winter cropping and strip grazing of dairy cows on hill country.</li> <li>4. Mitigations should instead be focused on "critical source areas" as identified in Farm Environment Plan. Erosion control on steep faces with poplar planting, fencing off impacted head-water seeps, excluding stock from critical parts and sensitive areas of each stream.</li> </ol>
<p>Schedule C. Definition of 'water body' includes any river that continually contains surface water..</p>	<p>OPPOSE</p>	<p>The extensive nature of hill country dry stock farms is such that some farms have between 30-50 smaller waterways up to 50km or more combined and therefore trying to mitigate every one is a financial impossibility.</p>	<p>Amend definition to read "any river that continually contains water and is more than 1m wide and 30cm deep on average. "This is in line with the National Water accord</p>

Policy 5: A staged approach	SUPPORT	We support in principle but each catchment needs to have a plan based on data from sub-catchments. Current data and the targets table is far too broad to provide meaningful and aspirational targets for hill country catchments.	The staged approach needs to be catchment and sub-catchment based and targeted to the specific water quality attributes of that sub-catchment – i.e which of the 4 contaminants are causing the biggest problem in that sub-catchment. Then sub-catchment or catchment committees need to form plans with farmer, lwi and local community stakeholders under WRC supervision and support to remedy as required and as technology and strategies develop in time based on Farm Environment Plans
Policy 6: Restricting land use change.	OPPOSE	We accept that some areas of Waikato may require restrictions of land-use .However the blanket approach of PC1 is an entirely inappropriate measure for some areas with far-ranging and poorly considered negative impacts for individual land owners and communities.(by reducing land values and eroding equity )This will instead restrict our region from meeting the needs of the community and its future economy.	Modify and include as an option in tailored sub-catchment plans when agreed by the community and committee and council involved as being appropriate. Some areas especially where dairy conversion and cropping is being considered resource consents may be required .For farming to be economically viable the flexibility to meet markets is vital. Restricting that right is economically unsound.
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	OPPOSE	We oppose the use of a Nitrogen Reference Point (grandparenting) because it favours systems that are heavy N emitters Those farms with low intensity and therefore environmentally less damaging systems will be severely devalued due to being locked at a low set N level. We also oppose it because the proposed tool for measuring N " Overseer" is not accurate enough for dry stock farms. We believe this blanket approach will severely affect catchments where there is no N issue and no problem	We think N can only be dealt with on a sub catchment basis where water testing deems it to be a contaminant problem. Appropriate mitigations can then target the contaminant leaching using the best science available

Schedule C. Animals must not be permitted to enter or pass across a bed of a water body except using a livestock crossing structure.	OPPOSE	The cost of building crossings suitable to withstand the large flood events of the last few years and the large number more extensive dry stock farms have, make this impossible to finance and very impractical to construct.	REMOVE. We think stipulating that frequently used crossings maybe >once a week require bridging or culverting.
Farm Environment Plans	Support	We consider this a good concept . But only with the farmer having the right to prepare their own with Council support, education and auditing. Farmers and landowners have intimate knowledge of their properties this must be utilised in any farm environment plan	A good chance for Council to work alongside farmers to monitor educate and improve sustainable farming practices and subsequent water quality. This joint approach we believe will have far better success than the arbitrary approach and expense of PC1's Farm plans.