

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.

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

SubForm	PC12016	COVER SHEET	
FOR OFFICE USE ONLY			
		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 my email must contain full contact details. We also request you send us a signed original by post or courier.</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	Matham Trust		
Full address	90 Baird Road Tokoroa		
Email	matham@xtra.co.nz	Phone	078869493
		Fax	

ADDRESS FOR SERVICE OF SUBMITTER

Full name	Mary-Ann Mathis		
	6 Paraonui Road RD1 Tokoroa		
Email	matham@xtra.co.nz	Phone	078869493
		Fax	

TRADE COMPETITION AND ADVERSE EFFECTS *(select appropriate)*

/X I could not gain an advantage in trade competition through this submission.

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SUBMISSION POINTS: General comments

The Matham Trust owns a 72ha grazing property in the Upper Waikato Catchment currently grazing 300 young stock, 20 bulls and 33 beef cows. It is located in the Mangamingi catchment area and adjacent to the Tokoroa urban area.

The Trust operates the farm as a drystock block having purchased the land a number of years ago from the South Waikato District Council. It had been earmarked for urban development but this did not occur. The property is bordered by several lifestyle blocks, the secondary school, a dairy farm and the Matarawa Stream. As well as grazing stock, the property is also used as a learning platform for agricultural students from Forest View High School and for occasional sports events for the school. We take great pride in operating the farm under the view of the urban area and believe we share “ownership” with our urban neighbours. A spring source is used by local for watercress. It was originally the water source for the dairy farm but greater use of bores in the area now mean the spring is intermittent at best. (see photos attached of school use and a view from the town)

The Matarawa Stream bordering our property has been fenced off for many years. There are no stock crossing points. Fencing the stream has been a done mainly for stock safety. However, the main issue with the stream now is the presence of grey willow and rubbish from town which is effectively altering the flow of the water. In recent years the Stream has started to seriously silt in some areas and undercut its banks in others. This has caused slumping of the stream banks and planting along the stream to collapse across it. The channelling of large amounts of stormwater from the town has exacerbated this process. There as a result of the poor quality of the water after it leaves the town.

There is no data for Nitrogen use for this land. Soil tests are done biennially and fertiliser applied as recommended.

We have an on-going tree planting programme growing many of our own trees and have planted areas subject to pugging in more robust pasture to minimise this. The farm is regularly used by school groups for farm-related activities and stock handling.

Our stocking rate has been constant for a number of years. Crops have not been grown for many years.

In the future, we plan to continue to utilise the land for stock grazing. However, its proximity to town and the high value of the land may make this unsustainable. Our options then are to subdivide or to sell to a neighbouring dairy farm. The Proposed Plan Change could seriously affect the economics of the property should we be unable to do this or to fund the process to do so. In order to continue to farm this land we need surety in consents and the rules imposed for a long period of time. We need to have flexibility in such things as stocking rates, growing crops for stock feed or sourcing outside feed when needed in order to cope with market demands and the vagaries of different seasons.

I am concerned about the following issues with PC1

- Grandparenting of stocking rates
- Imposing extra costs on the property in terms of monitoring and reporting will affect our ability to be sustainable. For example, our current practice of soil tests biennially is effective as soil tests change very little over time. Being required to employ approved consultants will add another level of costly bureaucracy.

- The timeframe to implement these changes is too tight given the level of research we need to do.
- Setting N reference points and demanding a marked improvement over time is counterproductive when the property may be performing well in this area. A carrot and stick approach has always proven to be less successful in creating the changes desired than other methods.
- Setting a level for cultivation at 15° slope is impractical in rolling country.
- Demanding 5 wire fencing along waterways is expensive and impractical in terms of controlling weeds along the streambank. A better approach would be to follow the lead of the Dairy Accord with two wire fencing and its definition of what constitutes a waterway.
- Setting levels expected for improvement across the board is unrealistic. The property may already be performing well and so has less scope to show major change or it may be affected by other land users in the area such as the case with our proximity to the sewerage plant of the town.
- There needs to be a consistent policy platform across all contributors including the urban area.

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
- 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

I am concerned about the implications all of this will have for my property and for my current activity as described above. I set out my 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			
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 as requested by Federated Farmers in their submission.</p> <p>Combine FEP with current requirements of Fonterra to stop duplication of bureaucracy costs. FEP accepted on merit- may be drawn up by number of people including farmer</p> <p>Make dates for FEP acceptance longer to allow time to research and verify</p> <p>Give flexibility to N reduction- too restrictive</p>	<p>This proposal will impose significant costs on my farming activities including The tight timeframe to collect and verify data, especially if FEP needs to be modified</p> <p>Needs to be flexibility with Overseer- it is a model only. Needs to allow for adverse weather events, major market issues etc. Having only registered FEP experts creates a climate for price hiking.</p> <p>Time needs to be allowed to meet N leaching limits- better to create a process of improvement over time which most farmers try to do anyway than imposing arbitrary levels which may be impossible or uneconomic to meet. The ability for Environment Waikato to make an ad hoc change to the model is also of concern.</p> <p>I am also concerned that this is not practical because we need certainty to be able to invest in the changes imposed on us and some flexibility to cope with weather events and other events such as stock health issues.</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	Amend 3.11.5.4 as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including The tight timeframe to collect and verify data, especially if FEP needs to be modified</p> <p>Needs to be flexibility with Overseer- it is a model only. Needs to allow for adverse weather events, major market issues etc. Having only registered FEP experts creates a climate for price hiking.</p> <p>Time needs to be allowed to meet N leaching limits- better to create a process of improvement over time which most farmers try to do anyway than imposing arbitrary levels which may be impossible or uneconomic to meet. The ability for Environment Waikato to make an ad hoc change to the model is also of concern.</p> <p>I am also concerned that this is not practical because we need certainty to be able to invest in the changes imposed on us and some flexibility to cope with weather events and other events such as stock health issues.</p>

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44	Rule 3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production			
45	Rule 3.11.5.7 Non-Complying Activity Rule – Land Use Change	OPPOSE	Amend 3.11.5.7 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities including the inability to adapt my farm for changes in either market-driven activities eg from grazing to dairy. The opportunity cost to intensify or change land use is important especially as this is an urban margin property.
46	Schedule A: Registration with Waikato Regional Council			
47	Schedule B: Nitrogen Reference point	OPPOSE	Amend Schedule B as requested by Federated Farmers in their submission. There should be some flexibility to the determination of the base years.	This proposal will impose significant costs on my farming activities including Determining the Nitrogen Reference Point is of concern especially given our lack of information for this type of property. The potential inability to farm at the current level would make this land decline in value as it is below the national average size for a dairy farm. This could

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			<p>Other influences need to be accounted for</p> <p>Other alternatives to Overseer need to be considered. It is a model and so provides a generalised understanding of systems but these are often found to be faulty in practice.</p>	<p>result in several million dollars of investment being lost. Being required to limit N also limits the funds available to reduce other losses. The proximity of this property to the Tokoroa urban area makes the levels of N, P and E Coli high in our base groundwater. The Stream is contaminated upstream by the town lake which harbours ducks in slow moving water.</p> <p>Farmers need to be able to illustrate their ability to improve environmentally using other science. As technologies improve so will the parameters used.</p>
50	Schedule C: Stock Exclusion	OPPOSE	<p>Amend Schedule C as requested by Federated Farmers in their submission.</p> <p>Fencing waterways has caused other environmental issues.</p>	<p>This proposal will impose significant costs on my farming activities including weed and pest control. The build up of willow and rubbish in the Matarawa Stream which has occurred since it has been fenced will cost a lot to clear.</p> <p>Requiring the fencing any intermittent waterways is not practical. It is also subject to the personal view of the agent concerned. It is also affected by urban stormwater channelling which artificially puts a lot of water through the farm at times. This makes the banks of the stream very unstable.</p>

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51	Schedule 1: Requirements for Farm Environment Plans	OPPOSE	Amend Schedule 1 as requested by Federated Farmers in their submission.	<p>The avoidance of cultivation on land over 15⁰ would make most of this land unfarmable. The value of the land would then plummet as would the productive return of the land.</p> <p>FEP requirements will add significant cost to my operation- estimated additional \$3000-\$10,000 based on advisors and farm management time. Nutrient budgets and nutrient management plans are things we have done for a number of years in conjunction with the fertiliser companies.</p>

Appendix 1



Students fencing



Girls fencing day



View from town across Matarawa Stream