

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

**To:** Waikato Regional Council  
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Complete the following

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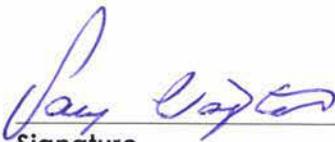
**Phone (Cell):** NO SIGNAL

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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.**

  
Signature \_\_\_\_\_ 21 2 17  
date

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

<p>The specific provisions my submission relates to are:</p> <p>State specifically what Objective, Policy, Rule, map, glossary, or issue you are referring to.</p>	<p>My submission is that:</p> <p>State:</p> <ul style="list-style-type: none"> <li>• whether you support, or oppose each provision listed in column 1;</li> <li>• brief reasons for your views.</li> </ul>	<p>The decision I would like the Waikato Regional Council to make is:</p> <p>Give:</p> <ul style="list-style-type: none"> <li>• precise details of the outcomes you would like to see for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you seek</li> </ul>
<p>Provision <u>INVESTMENTS</u></p> <p>WATERWAY COSTS.</p> <p>WATER REPT COSTS.</p> <p>CONSENT COSTS</p> <p>PHOTOS - L'STONE SUP</p> <hr/> <p>NRP - TRANSITION CURVES.</p> <p>IMPACT -</p> <p>EXCL. DRY STR FROM REPORTING.</p>	<p>I support/ oppose/ and for each whether or not you wish to amend <i>(delete as required)</i></p> <p>The reasons for this are:</p> <ul style="list-style-type: none"> <li>• <i>try to justify your response using data or by providing an example or story from your farm/ own experiences</i></li> </ul>	<p>I seek that the provision is: Deleted in its entirety/ Retained as proposed/ amended as set out below <i>(delete as required)</i></p> <p>As an alternative I propose</p> <ul style="list-style-type: none"> <li>• <i>What would be an appropriate alternative</i></li> </ul> <p>RECEIVE FINANCIAL ASSIST SUBSIDY.</p>

CRITICAL SOURCE AREAS

NO APPEAL PROCESS  
ACCOUNTABLE FOR OTHERS DISCHARGE.

Waikato Regional Council Proposed Waikato Regional Plan Change 1  
Waikato and Waipa River Catchments  
Submission written by Sally Wagstaff  
For N & S Wagstaff Partnership

I oppose:

**Schedule A – Properties with a greater area of 2 hectares.....** (exempt from reporting).

Reason:



Last year the smell of raw sewerage was evident in our road directly near a free flowing waterbody. 3 properties adjoin the water way and there was no visual evidence of where the discharge originated from. This went on over several weeks most noticeable of a morning. Those of us

downstream were not alerted to anyone experiencing problems. Eventually a conversation appeared on facebook and I could identify the property where the discharge leached from. That property is exempt from reporting on the WRC website (under 2 hect) and proposed policy. You can see from this photo our area is clearly rural. A large waterway runs through the property in question and connects to the stream that runs through our property, a property we lease and where children swim, and that of our neighbours further downstream.

Solution:

Rural properties (regardless of size) that are eligible to undertake farming or rural activities and/or border or contain a waterway should be held accountable for water care, quality, testing and reporting rules as per any other larger property.

I oppose:

**Schedule A 5. F. Where the land is used for grazing, the stocking rate of animals grazed on the land.**

Reason: The main income source for our business is the purchase and growing of "bobby calves" (dairy x) for the meat industry. There is **no unit measure**

+ US

+ LEASE BLOCKS

available for un-weaned calves of either gender so I presume under this proposal I am allowed to decide for myself how many to stock each season.

Assuming it takes me approx. 12 weeks (depending on breed/weight gain etc) to reach "weaning" weight my work is then measured not per head number but by stock unit number. According to the definition of a stock unit, a weaned heifer calf under 1 year old is worth **1.6** units. A weaned steer calf worth **2.7** units.

These calves (depending on per head volume) would usually then be distributed to the outer paddocks to be rotated in the best interest for calf weight gain/health, pasture health, ease of access etc.

At some point further along when (if) I weigh these weaned calves they suddenly jump in unit value to **5.7 units** for a heifer and **5.8** for a steer. Just in one day due to weighing. Through no fault of the animal but simply because it grew, my property according to the proposal unit measures may now be overstocked according to a stock unit number/total unit tally. This proposal does not take into consideration soil/pasture health or the application of best farming practice.

Solution: Remove the blanket approach of a stock unit tally in measuring stocking numbers.

I oppose:

### **Schedule B – Nitrogen Reference Point**

Reason:

The lands our enterprise is situated on are in transitional mode. The larger title (as shown on the WRC map) contained 13 hect. of radiata pine and was harvested over a 3 year period concluding summer 15/16. It is being returned to its former state of pasture. The fertiliser used on this title has been formulated via soil testing to account for nutrient losses due to the forestry and may not be relevant to future fertiliser requirements.

The two lease blocks and our second title are all lifestyle blocks that have been neglected. The fertiliser application on each title is done following regular soil testing and may not be relevant to future applications or soil health requirements.

Solution:

Allow individual property/enterprise flexibility of fertiliser application following regular soil/pasture testing rather than a blanket "one size fits all" approach.

I oppose:

**Schedule B – item G. The following records (where relevant to the land use undertaken on the property or enterprise) must be retained and provided to Waikato Regional Council at its request: i. .... Annual accounts together with stock sale and purchase invoices.**

Reason:

Annual accounts have no bearing on determining water or soil health. Annual accounts and income are also a private matter for any individual or enterprise and would be nothing more than a gross invasion of privacy if requested.

Solution:

Undertake testing of property waterways to ascertain if or what impact an enterprise might be having on waterways.

I oppose:

**Schedule C – item 2. New fences installed after 22<sup>nd</sup> October 2016 must be located to ensure cattle, horses, deer and pigs cannot be within 1 metre....**

Reason 1:

The date of 22<sup>nd</sup> October 2016 is when the proposal was publicly made available for consultation. Prior to that date landowners were not aware this proposal would be coming forward and there has been failure in bringing this proposal to the attention of all affected landowners. In our case our fencing plans and budget for 16/17 were set before 22/10/16 and are still being constructed. It would be grossly unfair and a financial burden to be required to remove fencing installed after 22<sup>nd</sup> October 2016 and prior to any proposal implementation legislation date.



Reason 2: In this photo you can see the use of electric fencing which is used to contain two horses to a set area of pasture each day on our property so they do not over eat. However can you see a waterway? No because the weeds and overgrowth have continued to grow up and out, and is starting to enclose the waterway. The bank opposite is

somewhat steep in parts. The overgrown weeds hide insecure footing spots.

This area will have to have spray applied to contain the weed growth however spray will end up in the waterway. Some types of recommended spray are not safe for aquatic life but may be the only type of spray able to have an impact on the weed growth (for instance there is a substantial wild blackberry patch to the left of the photo, not much knocks back blackberry).

Solution: Allow landowners/farmers to decide on best practice in managing water bank areas.

I Oppose:

**Schedule C – item 3. Livestock must not be permitted to enter onto or pass across the bed of the water body, except when using a livestock crossing structure.**



Reason: This is the bottom corner of one of our lease blocks and the only part where a waterway passes through. In the distance where indicated is the rear boundary fence, in the foreground is the other boundary fence. The two boundaries join just past the photo to the right. The land area to the right of the waterway is small and the cost to supply and install a crossing structure

would be prohibitive. Whilst fencing this portion of waterway is a consideration, the end result would leave a portion of land overgrown and require spraying which may further damage water life. Our cattle currently graze this corner of the property every 3 months or so for 1 x 24 hour period.

Solution: Allow for some waterways to be exempted from installation of stock crossings.

**I Oppose: Schedule 1 – Requirements for Farm Environment Plans.**

Reason 1: Firstly as a predominately dry stock farmer, I believe our enterprise generates far less sediment, nitrogen, phosphorus and microbial pathogens outcomes than that of neighbouring dairy and horticultural/cropping enterprises and should not have to undertake the same rigorous assessment and reporting in farm environment plans.

Solution reason 1: I believe each type of enterprise should be identified with a potential contamination rating and prepare their farm environment plans in conjunction with the risk factor. Those at the lower end of risk should be

allowed to self-report, whilst those industries at the higher end undertake a more thorough reporting method.

Reason 2: We have reason to believe that one of our lease block owners will object to the entry of a farm consultant or others onto his property for the assessment of our enterprise. He has recently refused access to NZ Bushpest Ltd for the purpose of possum control. We fear we would be penalised by this proposal due to the actions of the Landowner (in that not being able to fully assess our enterprise). The Landowner also retained the right to access and utilise his property. From time to time he may undertake work on or about the portions we graze. We feel an exemption should be in place so we are not liable.

Solution reason 2: Either in **Schedule A or schedule 1**, WRC makes provision to exempt an enterprise from reporting without penalty should their efforts be "obstructed" by a 3<sup>rd</sup> party such as a land owner and that Council be given power to negotiate/deal independently with the 3<sup>rd</sup> party to resolve the matter or have it heard and dealt with via Court.

Reason 3: Enterprise privacy. Farm Environment Plans should remain a private matter between WRC and the enterprise and not be publicly available. This does not seem to be addressed in the current proposal.

Solution reason 3: Ensure legislation protects individual and enterprise privacy.

### **Summary and other submission material**

Our (approx. 100 acre/40 hectare) enterprise includes two lease blocks plus our 2 titles here in Andrews Road. We bought the rear title back over 18 ½ years ago to raise our daughter on. It was all part of my in-laws dairy farm from the late 1940's to the mid 1970's. My Husband grew up here and recalls the streams full of water life, huge eels and crays. There was no fencing of waterways and the need for chemical fertiliser minimal.

During his youth approx. 37 family dairy farms existed in the Onewhero area (small herd numbers compared to these days). Approx. 8 dairy farms exist now and the area has seen the market gardens (MG) commence horticultural/cropping activity in the last 15 years as well as life style block subdivision (LSB) of productive farmland.

Without a doubt we all need to eat and the MG's in our area also provide economic benefits to our Country and employment to locals.

Our lease blocks are LSB's that are owner occupied. The owners are as far as we are aware, happy to see us improve their property via new fencing, weed control

and fertiliser and we graze our cattle/sheep which reduces their need for their input into the care of their lands.

I have attended as many meetings as possible in regard to this proposal and the 1 x part day information event run by WRC in Tuakau where I was able to obtain a hard copy of the proposal (hidden under the tables – not readily available to those entering the hall).

Rural areas such as ours have terrible internet access issues and it can be extremely hard for rural folk to maintain internet access to be able to read items such as the proposal. It's been a daunting process just to read the hard copy.

During this meeting our daughter and I spoke to several WRC people, asking the same questions. We received either mixed responses or that the person being spoken to could not assist with an answer. Only when we sat down with the last Gent were some of our questions answered although some are not contained in this proposal. I think a lot more could have been done to get more information out to landowners and farmers and in plain English than what has been achieved.

Due to our land size, in this proposal we are lumped in the same financial basket as the horticulturalists, but we don't have the income or resources to match.

Our land is our home as well as our business. We drink, shower and swim in our waters. It's in our best interests to look after what runs through our property.

We have an established association with WRC REMS & Fish Survey team. We have allowed them to monitor two of our waterways on the rear title (former forestry block). The results have always shown low water life in the waterway that comes from the market garden enterprise at the end of Andrews Road. The other waterway has been assessed as being normal.

We have noticed over the last 15 years the impact that neighbouring enterprises have over our lands. I would like to submit the following photos taken this weekend (18<sup>th</sup> February 2017).



All have been taken from the side of the road on Andrews Road or on the paper road section of Andrews Road which adjoins our rear title.

18<sup>th</sup> February 2017 – full following summer rain.  
Adjoins Andrews Road



Andrews Road paper road section

'Drain" to the left – weeds

MG Onions to the right on road.

Access to adjoining titles blocked



Andrews Road, Paper road section

Planted with onions. Run off from rain 18<sup>th</sup> February. Flows into adjoining dairy farm and into waterway that enters our rear title.

Resulting in.....



Silt build up in streams/waterways.



and dirty water in OUR waterways



Boundary fencing, A summer picture.

As you can imagine during winter weather the water speed and volume picks up. It is not practical to fence with more wire or timber as debris collects in the fence. It is also not possible to fence to contain silt. This is our boundary area where the silt in the earlier pictures comes through. Silt can travel via waterways for some distance and the power/force/volume of winter rain pushes it further along.

Surely for the sake of saving time and money it would be far more viable to test the water entry and exist point on each property to identify those enterprises who are compromising water health (with seasonal variances noted) rather than a total blanket ruling where a high polluting enterprise can carry on while the smaller enterprises such as ourselves are struggling to complete the work required whilst our impact is negligible.

While I'm sure this plan has the good intention of improving waterways, it lacks practicality and flexibility. We could fence every water way, remove stock access from every steep paddock and place drains and sediment ponds every 15m on tracks (an idea from 1 WRC person we spoke to) and we could cease all fertiliser application. This however would lead to a rapid increase in in noxious weed outbreaks, unused land and immense financial instability for farmers, particularly those at the smaller scale such as ourselves.

The key to maintaining a healthy environment largely comes down to flexibility. Almost every farmer knows how many animals his farm can carry sustainably and the need to be able to alter this at any given time.

The restrictiveness of this plan prohibits this and will likely make agriculture unprofitable and unviable for the Waikato district.

If a farmer can no longer choose his stock numbers due to "potential environmental damage" should any Council really be providing permission for more land to be subdivided and housing built due to damage by increased population impact on waterways.

My concerns also lay with the effectiveness of the plan. So far as I am aware we WRC has provided no research, data or even case studies to show the likelihood of improvement in waterways should all proposed ideas in the plan be enforced.

Should water quality continue to deteriorate further, what next and at whose expense? Will agriculturalists be bound to further tightening regulations or will the Council look to other industries for changes?

What will (and when) the Council use to measure the successfulness of this plan? Will there ever be a completion goal?

As a business owner in a continually evolving science based industry I would like to see WRC do more research into pollution causing enterprises and practices (of both rural, urban and industrial) and provide assistance/service to improve these before this plan becomes governed by legislation and applied to a select few, excluding many others.

Until this is done, I like many others cannot see any environmental or economic benefit of the plan nor can we implement its ideas without solid research showing its benefits.

Yours faithfully



Nigel, Sally & Erin Wagstaff