

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 <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 by 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 Duncan & Loraine Stobie		
Full address 959 Woodlands Road R D 1 Hamilton 3281		
Email bren.don@farmside.co.nz	Phone 07 8243508	Fax N/A

ADDRESS FOR SERVICE OF SUBMITTER		
Full name Donald & Craig Stobie		
Address for service of person making submission 921 Woodlands Road R D 1 Hamilton 3281		
Email bren.don@farmside.co.nz	Phone 0276732379	Fax N/A

TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i>
<input type="checkbox"/> I could / <input type="checkbox"/> could not gain an advantage in trade competition through this submission.
<input type="checkbox"/> I am / <input type="checkbox"/> am not directly affected by an effect of the subject matter of the submission that: (a) adversely effects the environment, and (b) does not relate to the trade competition or the effects of trade competition. Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

I am writing this submission on behalf of my family, my parents Duncan and Loraine Stobie, my brother Craig and myself (Donald) Stobie. We are the third and fourth generation to farm in New Zealand, with another generation coming along. So, I feel that we have an infinity with the land, you might say it's in our blood.

We are a beef, lamb and arable farm, with a land area of 445ha on Woodlands Road, Gordonton, in the lower Waikato catchment, Priority 1 sub-catchment. Our family brought their first piece of land here in 1974 slowly building up to the land area we have today.

We buy in about 1000 1yr steers over the summer and autumn and finish them the following spring. The arable side of the farm consists of about 160 ha of either maize silage for the dairy industry and maize grain for either the dairy industry or the food industry, with perennial and or annual grass planted in the autumn and grazed over the winter months with about 4-5000 lambs finished.

Our crop yields are in the top 5% in the country. We believe that we follow industry best practice across the farm with our livestock and cropping. All our drains are fenced and have been since we started farming here, we have a fully reticulated water system and troughs to all paddocks on the farm. All livestock are rotationally grazed around the paddocks. We soil test every year for the pasture and cropping ground and use Dr Doug Edmeades of Agknowledge for our fertiliser recommendations, so to put the right amount on for the expected yield.

This proposed Plan Change 1 has put a hand brake on our farming business going forward. We had planned to expand our land holding, but with the uncertainty of the rules this would be unwise due to the financial cost that the rules will incur on us. We participated in the Federated Farmer case study project that looked at 12 farms, for the purpose of what would a Farm Environment Plan cost and what would be the cost and or losses to the farm to meet PC1. The cost for the farm plans averaged \$4,692 and ranged between \$2,180-\$7,542 depending on the farm size and complexity. In the case study for our property to meet the current PC1 rules the annual loss in profit was estimated to be between \$76,000 and \$100,000 due to the 5m setback rule, on top of the cost of any consents that would be required for us to farm. The council did not offer any guide as to what that might be, but we have later been told this could be between \$10,000 and \$100,000 to obtain. These costs are simply just not affordable and with no certainty that the rules will even achieve the results that are hoped for.

We agree with the aspiration of the Vision and Strategy for the Waikato and Waipa Rivers. You might say who wouldn't want the rivers to be clean, but at what cost. Do we want at least half of the catchment turned back to trees as the long-term plan states, with all the loss of jobs and rural communities? Where is the social justice in that? What we actually need is a conversation between the urban and rural communities to come to an agreement about the balance with the environment and the prosperity of the region. The vision and strategy is an aspiration for the health of the rivers, but let's not forget the aspiration for the health and prosperity of the communities around it.

We Support the submission that has been lodged by Federated Farmers. We are particularly concerned with the following parts of Plan Change 1:

- The negative effect to the rural communities.
- The cost and practicality of the rules.
- The cost of the farm plan and on our business with loss of income.
- The lack of science and lack of monitoring at a sub catchment level.
- The nitrogen reference point effect on our farms potential income and the value.
- The cultivation setback rule.
- Setting nutrient loss limits at the 95th percentile for water test (mainly for E. coli).

We are concerned with the impact all of the above will have on our farming business. Please see below for the details of our concerns.

THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO

*Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1
(continue on separate sheet(s) if necessary.)*

Schedule 1:2.(f)(ii)(d) Cultivation 5m setback.

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

(select as appropriate and continue on separate sheet(s) if necessary.)

- Support the above provisions
- Support the above provision with amendments
- Oppose the above provisions

MY SUBMISSION IS THAT

*Tell us the reasons why you support or oppose or wish to have the specific provisions amended.
(Please continue on separate sheet(s) if necessary.)*

We would like to amend this blanket rule

We farm flat peat land and thus when it rains there is very slow velocity from water moving off the paddocks and peat soil is not prone to sediment movement. The time that the cultivated land is most prone to erosion is during the periods of crop establishment. Maize plants are well established after 4 weeks and the crop canopy reaches closure at 6 weeks.

This rule has the potential to have a large financial impact on our business.

I SEEK THE FOLLOWING DECISION BY COUNCIL

(select as appropriate and continue on separate sheet(s) if necessary.)

- Accept the above provision
- Accept the above provision with amendments as outlined below
- Decline the above provision
- If not declined, then amend the above provision as outlined below

Amend as follows: We would like the rule to be more open to allow discretion for different land slopes and soil types. The setbacks could easily be agreed to with your farm planner with the assistance of soil S maps. We feel that for our type of ground 0.6m setback would be a good starting point.

Research shows that 91% of incoming sediment through a grass filter strip was deposited in the first 0.6m. (Parklyn, S. (2004, September). Review of Riparian Buffer Zone (MAF). 5m buffer strips are excessive in many situations.

A 0.6m grass strip at a slope of 10% will reduce soil loss between 63-85% depending on the cultivation programme of the land (Yuan, Bingner, & Locke, 2009). Compared to other vegetation, grasses were found to be the option for trapping sediments.

PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

I wish to speak at the hearing in support of my submissions.

I do not wish to speak at the hearing in support of my submissions.

JOINT SUBMISSIONS

If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

Yes, I have attached extra sheets.

No, I have not attached extra sheets.

SIGNATURE OF SUBMITTER

(or person authorised to sign on behalf of submitter)

A signature is not required if you make your submission by electronic means.

Signature



Date

2/3/2017

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.

PLEASE CHECK that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

Additional sheet to assist in making a submission

Section number of the Plan Change	Support /Oppose	Submission	Decision sought
Please refer to title and page numbers used in the plan change document	Indicate whether you support or oppose the provision.	State in summary the nature of your submission and the reasons for it.	State clearly the decision and/or suggested changes you want Council to make on the provision.
Nitrogen Reference point. Schedule B.	Oppose	We oppose having a nitrogen reference number as this is just another word for grandparenting. By placing a number on us you are setting our land values. Overseer is widely known to be only good as a guide. It does not handle arable farming with regard to different crops and cover cropping and grazing.	We cannot see why nitrogen cannot be covered by an input output system with pasture and cropping and the use of best practice. In Canterbury, they are using a system called NCheck. Could this be used in the Waikato.
Land change, No more vegetable area. Policy 6:	Amend this rule	We would like to amend this rule because it just adds another layer of cost and restriction to our farm business.	We propose that the rule has more discretion and is more applicable to the individual farm and leaves the onus of meeting the nutrient levels within the farm plan rather than needing a new consent.
Nitrogen & E. coli targets. 11-1:	Amend this rule	We feel this rule should be amended because setting the limits at the 95 th percentile is just unachievable. This limit is saying that even in a flood you need to achieve this. People are already swimming and gathering food from river. This rule will just simply not work.	We would like the rule to be amended to say something like meeting the water body target 80 percent of the time.
Objective 2, 4	Amend	This plan in its current state is setting out that the rural and a lot of urban communities will be closed down or diminish in size. This plan is very clear that it is starting us down a path of returning half the catchment back to forest. It should not be underestimated the large reliance the communities have on agriculture.	This plan needs to have a high regard for the ability of communities to thrive and prosper.

Policy 9,3.11.4.5	Amend	We feel that there has not been enough done in this space. Our catchment has one water test sight and this test covers 36,000 ha and a lot of different soils and contour. We feel that there should have already been a lot more in depth water testing done so that PC1 could have had direct benefit in regards to fixing and targeting the major problem areas first. But instead this plan blames everyone. Would it not be better to target the actual problems	More detailed water testing should be done in the Sub Sub catchments before some of the rules come into place.
Schedule B- Nitrogen Reference Point (g) i. iv.	Amend	We think that asking for our invoices on these matters is a step to far as this is private business information and what is the guarantee that this information will not be passed on to someone else	We ask that this be taken out of this section.
Policy 16	Amend	We make it very clear that we agree that Maori have every right to develop their lands. But we disagree that the people in the Waikato and Waipa should have to give the "head room" for this land to be developed by reducing our nutrient losses by extra. The people of the Waikato and Waipa are not the ones who stopped this development from happening. That was the governments of the time, so it should be the government who compensates.	We ask that the "head room" that will be needed to develop Maori land be funded and or offset by central government