

Proposed Waikato Regional Plan Change 1 – 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 Please Note: if you fax your submission, please post or deliver a copy also
Emailed to	healthyrivers@waikatoregion.govt.nz Please Note: Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.
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 Sybil Telford Robinson as a trustee for the DVL and ST Robinson Family Trust		
Full address 64 Koroko Road, RD1, Te Awamutu 3879		
Email sybil@farmside.co.nz	Phone 078721784	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name Sybil Telford Robinson as a trustee for the DVL and ST Robinson Family Trust		
Address for service of person making submission 64 Koroko Road, Rd1, Te Awamutu		
Email sybil@farmside.co.nz	Phone 021904852	Fax

PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION
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

Lynette J. Robinson

Date

07.03.17

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

We have a 130 hectare drystock farm in the Mangapiko sub-catchment which is in the Priority 2 area. Our Trust leases the farm to our son and his family. They are running 500 ewes, dairy grazers and trading cattle. Our family came to this property in 1946 when my father won a ballot for returned servicemen. We now have the third generation on the farm.

This property has always farmed responsibly and don't believe we have ever contributed to the degradation of the region's waterways. I particularly am offended by the provision of the Nitrogen Reference Point in the Plan which is a form of grandparenting. How can a farming business operate under these constraints? The weather every year is different and the markets are different-a farming business needs to be able to adapt every year, and not be constrained.

I think if the plan constrained the high input farmers by not allowing urea to be applied and cap supplements not made on the land then the 10 year goal nitrogen goal will easily be attained.

I have major concerns regarding the lack of scientific data relating to water quality in each sub – catchment. I am also concerned by the significant lack of detail within the plan. Reading the plan it appears that we will be forced to make substantial capital investment fencing property that in the future we may be forced to plant in forestry. I also have concerns as to how we will financially afford to build fences and plant forests with a significantly reduced income with enforced reduction of our stocking rates.

I am disappointed at the lack of transparency of the selection of those appointed to the Collaborative Stakeholder Group (CSG). I am also disappointed with the amount of drystock farmers on the CSG - this was not a fair proportion of our industry given drystock farmers make up around half of the farmers affected. The drystock representative on the CSG did not sign off on the proposal. We don't understand why the urban community is not contributing to the clean-up of our streams and our rivers. The impacts of urban centres on the environment are significant however despite being well represented on the CSG there is no provision to reduce or cap impacts.

With the withdrawal of the Hauraki Iwi and that section of the catchment and the reasons outlined above I believe that Plan Change 1 should be withdrawn by the Waikato Regional Council and a better one developed with more targeted sub-catchment policies.

I support the vision of having clean and swimmable rivers but believe there are better ways of achieving this vision.



I am concerned about the following issues with PC1

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

- **The effect that the Nitrogen Reference Point will have on our business and our economic wellbeing.**
- The significant negative effect on rural communities
- The cost and practicality of the rules.
- 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
- The lack of clarity as to what actually constitutes a clean river. Why do the plans standards differ from the national standards?

I do not wish to be heard at the Hearing.

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
41	<p>Rule 3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme</p>	<p>OPPOSE</p>	<p>Amend 3.11.5.3 as requested by Federated Farmers in their submission.</p>	<p>This proposal will impose significant costs on my farming activities including in getting a plan together and complying with all the steps. In Priority 2 area we believe the time limit of 1 July 2023 is too early.</p> <p>We are also concerned that this is not practical because we are likely to need more time to firstly consider our options when or if Plan Change 1 is approved, and also more time after that to establish our Farm Environment Plan.</p>
45	<p>Rule 3.11.5.7 Non-Complying Activity Rule – Land Use Change</p>	<p>OPPOSE</p>	<p>Amend 3.11.5.7 as requested by Federated Farmers in their submission.</p>	<p>This proposal will impose significant costs on our farming future. This prevents us from expanding or converting to different models. We own the land and feel we have a right (within reason) to change its use. We lose all flexibility to adapt to new markets or different circumstances. It will also reduce the value of the land.</p>

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47	Schedule B: Nitrogen Reference point	OPPOSE (STRONGLY)	<p>Any one or more of the following:</p> <ul style="list-style-type: none"> -Scrap the NRP Rule altogether - A ban on urea to reduce Nitrogen leaching -Instead of the NRP. A maximum stocking rate, say no more than 18 stock units per hectare (rolling average) managed through individual farm approved plans. -If previous periods of activity are to be taken into account we would like to see a longer period, 2005 to 2015. -Instead of the top 25% of nitrogen emitters being required to come back to the 75th percentile. I would like to see the top 50% come back to the 50th percentile. -Do more research and testing and conclusions around discharges from sub-catchments and manage losses tailored to those areas. -Consider the effects on sequestering carbon in soils. This requires farmers to build carbon in their soils which in turn holds onto nutrients and water better. Urea destroys carbon! - Amend Schedule B as requested by Federated Farmers in their submission. 	<p>This proposal will impose significant costs on our farming future and possibly lead to our farm being not viable because of:</p> <ul style="list-style-type: none"> - Lack of flexibility to run our business according to the weather conditions and market conditions. -The timeframes that the NRP is referenced to were very dry and difficult years and we had low stock counts and inputs. We are not high input farmers in the best of times! - Our land value will decrease as our land will be limited in its carrying capacity -Overseer is not a reliable measurer of real contaminant losses <p>A reduction in viability will also lead to other effects within our community:</p> <ul style="list-style-type: none"> -Inequalities between neighbour's production capabilities and resentment as a result. Higher dischargers will have no incentive to reduce discharges. -More people seeking and relying on off-farm income -Less employment and opportunities for families to enable succession -Less income into the community -Ultimately people walking away from farming -A breakdown in our local farming community -Breakdown of goodwill between the drystock farming community and the Waikato Regional Council. <p>I would like to see the banning of Urea as this would significantly reduce nitrogen leaching in our catchment and more than likely exceed the 10% improvement in water quality in the first 10 years.</p>

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50	Schedule C: Stock Exclusion	OPPOSE	<p>Amend Schedule C as requested by Federated Farmers in their submission.</p> <p>Scrap the need to fence swamps and springs</p>	<p>This proposal will impose significant costs on our farming activities including the costs to fence and the costs of ongoing maintenance.</p> <p>-We estimate that it would cost over \$100,000 and we can't afford that amount of money in the timeframe</p> <p>If the Plan was concentrated in a sub-catchment by sub-catchment basis and testing revealed that fencing would make a difference we would be happy to contribute.</p> <p>I also have grave concerns with the fencing off of waterways will create other problems:</p> <p>-Weeds (particularly blackberry) will proliferate. The (attempted) control of weeds with herbicides and glysohate will result in the chemicals multiplying in our water and causing health problems. Ultimately the rivers will become 'unswimmable' for different reasons.</p> <p>-Sediment: I believe sediment will just build up in the waterways and then arrive into the rivers in extreme weather events. The amount of sediment to the rivers in our opinion won't decrease in total, just the distribution of its arrival. I have seen this with a Reserve above our stream that runs through our property. At times the sediment is considerably worse than it used to be when it was a running stream.</p> <p>Fencing some of the swamps on our farm is impractical as it is often steep.</p>

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				<p>We are concerned that investment made fencing our slopes over 15 degrees (which will be a large proportion of fencing) will be wasted when at some undisclosed point in the future we will be forced to plant these slopes in forestry. Forests cannot be paid for out of income of the business particularly if we are farming under proposed Nitrogen Reference Point. It is unlikely we will be able to borrow money to put in forestry either.</p> <p>I would like to see testing of waterways at entry and exit points of sub-catchments and at points along the way and plans set around where the money is spent to improve water quality. Also by identifying which farms are contributing to the problems (if any) and working on those first.</p>

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