

Submission to Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments

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 mixed beef and sheep dryland arable farm, with a land area of 445ha, on Woodlands Road, Gordonton, Hamilton. We are in the lower Waikato catchment, priority 1 sub-catchment. Our family brought our first piece of land here in 1974, having moved down from Ardmore in the area of Clevedon just out of Auckland where they had a small, town supply milking farm and slowly building up to the current area we have today.

Being an arable farm, we need to be very flexible with what the market signals tell us. Depending on the year we can be running between 800-1200 fattening cattle and fattening 3000-6000 lambs and cropping 160-220 hectares of at the moment maize silage for the dairy industry and maize grain for either the dairy industry or the food sector.

We run what we consider to be an intergraded farm system, where the cropping and livestock areas are rotated between them all. We believe that we run a good balance between being sustainable, productive and profitable. Our crop yields are in the top 10% in the country and are very consistent and repeatable year on year. We believe that we are following current best practice across the farm with our livestock and cropping.

Our soil type is consolidated peat, so we have a higher proportion of drains on our farm to manage the water table throughout the year. All of these drains are fenced off to prevent livestock from entering them, although they can be dry for 20-50% of the year. We have a fully reticulated water system with two water troughs in each paddock. (average paddock size is 1.8ha). All livestock are rotationally grazed around the paddocks in pasture to optimise pasture growth. We always plant cover crops behind our main crops, so our paddocks are not left fallow between seasons.

We have a soil fertility testing programme lead by Mr Dr Doug Edmeades of Agknowledge that we follow each year with the farm sampled in small land area parcels of about 20 hectares. This is approximately 21 soil samples in total. Mr Edmeades then works out our fertilizer recommendations and application rates to supply the pasture and crops with the optimum nutrient levels to grow.

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 a 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 opportunity 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. In the council response to these plans they did not offer any guidance as to whether these plans would meet the PC1 requirements and what cost a consent might be. We have since looked into this ourselves and been told this could be between \$10,000 and \$100,000 to obtain. These costs are simply just not affordable with the time frame of each plan change and with no certainty that the rules will even achieve the results that are hoped for.

We feel that this proposed Plan Change 1 and the very short intervals in the plan going forward have given a very negative feeling towards it. Why or how would we invest money and time into our farm going forward to keep improving our environmental foot print when the time frames are so short for the rules, and with not knowing what the next set of rules are going to say, and also this very plan says that in 80 years' time at least half of the Waikato and Waipa catchment is going to be returned to trees.

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 and wellbeing of the rivers and the communities. As I read, the plan it does not say that we have to achieve a number or target, only that we should aspire to have the water cleaner than it is today, so people can swim and collect food. I may be mistaken but I am sure that people already swim and collect food and under take many other recreational activities in the rivers. So, let's not forget the aspiration for the health and prosperity of the communities around it.

I was able to attend a few hours on the second day of submissions, and it was very disheartening to hear one of the regional council planners give an answer to a question that a commissioner asked regarding the weighting between cleaning up the rivers and the wellbeing of the communities, be it social or economic. The reply as I understood it was that the council was only going to care about water quality at all cost, and only then give regard to the communities that might be left when the process is achieved. Although this was disheartening to hear, at least we now know how strongly they believe in closing us down.

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 or consents 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 farm's 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.

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

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 movement 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.

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.

We had a meeting with Allen Campbell and Marc Gascoigne from the regional council on our farm to discuss the set back rule and clarify the definition of a water course. Allen agreed with our thinking that we had man made drains and not streams, rivers or a water course. Allen also agreed that a smaller set back would be fine and agreed that a set back of 600mm was good. We did ask Allen for this in writing but he was not forthcoming with that, but he assured us that he would vouch for us if he was asked to do so. We took Allan's word in good faith on this.

We would also like you to exclude any man-made drain from this plan change 1.

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.

Nitrogen Reference point. Schedule B.

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 and supposedly what we can do on our land. 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.

When the PC1 process started we ran Overseer on our farm for 2 years in a row (2012-2013) to give us an idea how we were going to stack up against the proposed rules. We very

quickly discovered that Overseer just simply could not cope with how our farm systems work.

We keep up to date with model developments and recently attended an information day with Overseer where they presented the latest version Overseer FM.

Some of the model's problems are:

The plant rooting depth is set at 600mm, regardless of the fact that you might be growing maize with a rooting depth approximately 1.2-1.5 metre or summer /winter grazing crops with a rooting depth well in excess of 600mm.

As we understand our soil type has not had any science work done on it to even know what nutrients are moving through it in regards to Overseer.

We would also like it noted that just because Overseer says that a nutrient has either moved below a rotting zone or lifted above the ground level, this does not automatically mean that the nutrient has actually gone into the air or gone down to the river. It is only stating that the nutrient has moved outside the parameters of the Overseer model. If you ask the Overseer people this they will agree.

The Overseer model is broken down into 12 blocks, with each block representing each month of the year, but the problem with this is it does not then allow multiple activities to be entered in each month. E.g. You can not say do some cultivation today then apply some fertilizer tomorrow and plant the crop the day after and thus the crop will be up and growing within a few weeks. With the current model it makes you spread this out over a couple of months which in turn then makes your end of year results look worse than they would because of the lag effect.

We ask that Overseer be withdrawn from PC1 until a time that it can be shown to be accurate with all farming systems.

We would also like it to be noted that people who say all the blame with nitrogen leaching is directly related to the amount of urea applied is frankly incorrect. There are many forms of nitrogen and ways for nitrogen to get in the soil, and many different farming systems with different nitrogen efficiencies in regards to the amount of yield versus the amount applied.

In Canterbury The Foundation for Arable Research developed a system called N Check. Could this be used in the Waikato.

Land change, No more vegetable area. Policy 6:

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 more room for the land capability to match the land use and the onus of meeting this within the farm plan rather than needing a new consent.

The question that we do not understand is why does this plan have this rule and the Nitrogen rule, with both rules seemingly trying to do the same thing. Not that we agree with these rules, but why would you not just apply the "KISS" rule (keep it simple stupid). If the plan requires a nitrogen number why then would you need a consent to change land uses?? At say \$10,000 to \$100,000.

E.g. Let's say you have a 100ha dairy farm and you buy 100ha dry stock block next door. Dairy farm number is 35kgNha and dry stock block is 15kgNha. Apply "KISS" 35kgNha +15kgNha=50kgNha then $50/2=25\text{kgNha}$. So new farm area of 200ha now just has to farm at 25kgNha. Really simple and worked out in minutes with NO consent needed NO money needed just written up in a farm plan.

Nitrogen & E. coli targets. 11-1:

We feel this rule should be amended, because firstly the vision and strategy does not say you need targets, only that you improve the water. But setting the limits at the 95th 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 the river.

This rule is simply never going to work and should not have been put in. The bases for this rule are to take water quality back to 1863 levels. Are we also going to take the population and the prosperity of the Waikato back to the 1863 levels? Does the community want to live like 1863? The overall plan says that we cannot even reach these levels, so why would you even put this in the plan. Maybe you could have a level (lower level) set for a period in the year that reflect the weather and likely hood of people wanting to swim.

Objective 2, 4

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 under estimated 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

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?

Schedule B- Nitrogen Reference Point (g) i. iv.

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

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.

Also, this can apply to any town or city, that it should not be the farmers that have to give the “head room” so they can house more people and use more water and discharge more contaminates. So, to help this from happening should you consider putting in the plan a population cap or a sinking lid approach on towns and cities?