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To: [Healthy Rivers](#)
Subject: Healthy Rivers Plan Change One
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WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 WAIKATO AND WAIPA RIVER CATCHMENTS

Submission on a publicly 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

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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.

Peter Lloyd Elliott 7-3-2017

"The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following table. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan, including Objectives, Policies, or other rules, or restructuring of the Plan, or parts thereof, to give effect to the relief sought".

Restricting Land Use Change

We object to not being able to lease (if we wish) part of our small farm to an adjoining dairying farmer. Our small farm is currently used as a breeding (sheep) and finishing farm. Contour is about 1/3 easy (tractor contour), 1/3 medium and 1/3 steep. Currently sheep farming is barely profitable and so we have in recent times reduced sheep numbers in favour of beef cattle but who knows what the future holds? We need the flexibility to farm whichever class of stock allows us to eke out a living. Now being 63 and slowing down I want the flexibility to lease the easy country of a neighbouring dairy farmer if that option suits best. Financially, not being able to use the easy part for dairying could de-value 1/3 of the farm

by \$10,000 per hectare. In terms of income, not being able to utilize the easy contour for dairy farming could cost me the equivalent of the pension and ensure a fairly austere semi-retirement as well as requiring a greater workload which will probably also not be welcome. This little farm is basically the entire product of my working life and I hope that it provides for my declining years without unnecessary impediment.

As regards the possible future requirement that our steep land would have to be planted in trees, I would strongly object to this. Establishing a forest is not a cheap business – they are very cash hungry until all silvicultural work is complete at around 10-12 years, and this would be a financial burden I don't want as a pensioner.

The financial return for forestry depends much on contour and worsens where steep contour makes harvesting slower and thus more expensive and the necessary roading more difficult, expensive and environmentally damaging. Bear in mind the grower only gets what is left after all costs have been met, probably some 25 years after planting and after being burdened with all expenses including rates for all the preceding years.

Aesthetically plantation forests are not pleasing and our steep country is very much in our face being the predominant feature of our views so I would also object for that reason.

Our steep country is mostly south facing and the steepest we have never grazed with cattle, only sheep for two reasons:

- There are bluffs dangerous to cattle and it is also very fragile especially in winter when it receives very little sun. We think we are already doing a damn good job of managing it sensibly. In grazing our steeper country with sheep only, we don't believe we are creating a water quality problem. If we were required to plant our steep country in trees our considerable investment in fencing would also prove to have been a waste of time, effort and money.
- If we were required to plant forests, we should then be automatically granted irrevocable resource consent to harvest at the time of planting and be granted rates relief for the affected area as it will be for many years be only a financial liability.

There are also other implications that I do not believe have been considered at all.

The demise of the once fabulous Taupo trout fishery coincides with the establishment of pine forests in the Taupo catchment and it is my belief that pines are a big negative for trout and quite possibly for other aquatic life also.

As I understand it, pastoral agriculture is the only means by which carbon dioxide can be removed from the atmosphere and permanently stored in the soil as carbon – the big proviso being that the pasture is not fertilized with urea as this actually destroys soil carbon at the rate of about one tonne of carbon per hectare per year. If you think about how much carbon would have been contained in New Zealand's original forest cover in pre-European times and much of that carbon remains today – I would suggest that the amount is pitifully small. The inevitable conclusion is that forests do not in fact sequester carbon for a very long time at all and despite timber treatment, houses have a finite life and in the end inevitably revert to carbon dioxide.

It is my belief that removing carbon dioxide from the atmosphere will become a much more pressing issue for humanity in the future and pastoral agriculture will have an important role in achieving this.

So be careful what you wish for, getting it wrong could have serious implications for us all.

Grandparenting as Nitrogen discharge management

I object to being permanently capped by a 'nitrogen reference point' calculated by "Overseer" between 2014 and 2016. Nobody, including descendants and future owners of a property should be permanently disadvantaged by sub optimal fertility. This is so very unfair that dry stock properties, that are not really a significant cause of the poor water quality are in effect to be disadvantaged so that Dairying and cropping can carry on largely unaffected.

For ourselves, we have in recent years been trying to improve our soil fertility, but it is an expensive business and we are not there yet. Fertilizer and lime take time to work and I object to being required for all time to suffer poor pasture quality, weeds and sub optimal animal health and production. Good, adequate nutrient level balanced with pH and trace elements are critical to pasture being able to uptake nitrogen from urine before it is leached into the ground water.

If we were prevented from having adequate soil fertility, then our property is permanently condemned to being a property of lesser quality and I would guess that this would probably lessen its market value by \$10,000 per hectare and given the risk of the Healthy Rivers Plan as proposed quite possibly make it impossible to sell at all.

Under these circumstances my two sons might quite rightly regard their inheritance as a poisoned chalice. We have already fenced our waterways to a considerable degree but much of what remains is difficult to fence. We could graze these areas with sheep only, but I fear that sheep farmers will quite possibly become extinct because there is an inadequate return for the work involved. Farming is very much a moving target and the ability to react to all the variables – markets, exchange rates, climate etc. is an essential part of staying afloat financially. Flexibility is the key to survival and I object to any regulations that impedes our ability in this respect.

A far smarter strategy to achieve the healthy clean rivers that we all wish for would be to ban or severely restrict the use of urea.

I believe the deterioration in water quality is to a large degree attributable to the use of urea. The deterioration has occurred markedly as the use of urea has increased since the commissioning of the Kapuni Ammonia – urea plant in the 1980s. Urea causes problems in several ways. Firstly, grazing animals fed nitrogen rich grass – drink more water as the rumen seeks to expel nitrogen – the consequence being more urine and nitrogen rich at that. Urea also promotes destruction of soil humus so that the soil is less able to hold nutrients and water and so increases leaching and run-off. Remember too, elementary chemistry: all nitrates are soluble!

The big problem that use of urea creates though is that it allows much heavier stocking rates than was possible in the past and this is a significant part of the problem – many more animals. I would like to point out though that while use of urea is not used exclusively by Dairy farmers, they are major users because typically a Dairy farm has easier contour that allows applications by a wheeled vehicle and that makes its use convenient and very cheap. Conversely it is seldom used on hill country because it must be spread by air and the effect is too short lived and too expensive to be economically justified.

As proposed I feel that hill country farmers are to be penalised with extremely expensive remedies to cure a problem not of their making and having done that may, ten years on, then be required to plant forests and take the financial loss on the chin. Without constraints on intensive dairying the problem will likely remain unchanged and all their efforts will have been an expensive exercise in futility.

Meanwhile urban communities can continue to discharge sewage into river and harbours with immunity and growth is apparently to be celebrated.

Reducing contaminant loss from farm

As I have outlined, I think I already do a good job of sensibly managing our little farm we are well on the way to having all cattle excluded from waterways and they are not shifted through waterways.

I think it would be unfair if I would now be required to reduce stocking rates. This in effect would penalize me for the work and expense already incurred in sensitive farm and grazing management.

I am also very concerned about the cost to me of a 'Farm Environment Plan'. Doubtless the requirement will spawn a huge number of bureaucrats and consultants all of which will have to be paid for, and with all due respect, I think I know more about our little farm than anyone else alive.

We live and farm here because it is what we love to do and we think we perform an important function in growing food, but as a money making venture it's a complete disaster. Further expense inflicted on us can only cause more austerity and rates are already poor value for money.

I have no problem with the proposed rules regarding cultivation and riparian margin, these have been standard practice for many years.

Thank you for the opportunity to comment on Plan Change One but I really feel it needs serious amendments in order to achieve its aims.