

PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 WAIKATO AND WAIPĀ RIVER CATCHMENTS



Submission form on publicly notified – Proposed
Waikato Regional Plan Change 1 – Waikato and
Waipā River Catchments.

Important: Save this PDF to your computer before answering.
If you edit the original form from this webpage, your changes
will not save. Please check or update your software to allow
for editing. We recommend Acrobat Reader.

FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

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|---------------------|---------|-------------------|--|
| SubForm | PC12016 | COVER SHEET | |
| FOR OFFICE USE ONLY | | | |
| | | Submission Number | |
| Entered | | Initials | |
| File Ref | | Sheet 1 of | |

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 to one of the above addresses |
| Emailed to | healthyrivers@waikatoregion.govt.nz Please Note: Submissions received by email must contain full contact details. |
| 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: Peter Brown
 Full address: 534 Frost Road RD4 Ohinewai 3784
 Email: pmbrown@farmside.co.nz
 Phone: 027 695 9640 / 07 828 5826 Fax: _____

ADDRESS FOR SERVICE OF SUBMITTER

Full name: PH & MA Brown
 Address for service of person making submission: 534 Frost Road RD4 Ohinewai 3784
 Email: pmbrown@farmside.co.nz
 Phone: 027 695 9640 / 07 828 5826 Fax: _____

TRADE COMPETITION AND ADVERSE EFFECTS (select appropriate)

- I could / could not gain an advantage in trade competition through this submission.
- I am / 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.

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, Para 5 : Nitrogen Reference Point Provision

Schedule B, Part G : Disclosure of private financial information

3.11.5.7 : Non-complying activity rule - Land Use Change

3.11.4.3 : Farm Environment Plans

3.11.2, Objective 5 : Mana Tangata

3.11.52, Para 4 : Permitted Activity Rule - 15 degree slope

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).

I oppose this change including the 75th percentile rule. based on two low dairy payout years nitrogen and other fertiliser application has been significantly lower than the norm and this is reflected in our nitrogen base point. Measurement and monitoring for a period of 5 -10 years would more accurately reflect long term nitrogen use.

I object strongly to the disclosure of private financial information. What purpose does this serve.

No opportunity has been available to submit on this rule implemented on 22nd October 2016. This unfairly restricts future land uses, which creates land value equity loss.

Farmers are further financially burdened by the requirement to have a Farm Environment Plan prepared by a Certified person. The robust Third Party Audit (independent of the farmer and Certified Farm Environment Planner) will be an addition cost to the farmer. The compliance required to farm requires greater input than the actual physical farming.

All farmers should be treated equally, no provision for Tangata Whenua should be granted.

No part of the property or enterprise over 15 degrees slope is cultivate or grazed. This rule is unrealistic and will have serious negative impacts of farming in New Zealand and the economy of New Zealand.

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
- Decline the above provision
- If not declined, then amend the above provision as outlined

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

Signature: 

Date: 6/3/2017

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: Schedule 1, Para 5 : Nitrogen Reference Point Provision

Do you support or oppose the provision?

Support

Oppose

| Submission | Decision Sought |
|---|--|
| <p><i>State in summary the nature of your submission and the reasons for it.</i></p> <p>I oppose this change including the 75th percentile rule. based on two low dairy payout years nitrogen and other fertiliser application has been significantly lower than the norm and this is reflected in our nitrogen base point.</p> <p>Measurement and monitoring for a period of 5 -10 years would more accurately reflect long term nitrogen use.</p> | <p><i>State clearly the decision and/or suggested changes you want Council to make on the provision.</i></p> <p>Measurement and monitoring for a period of 5 -10 years for Nitrogen Reference Point.</p> |

Section number of the Plan Change: Schedule B, Part G: Disclosure of private financial information

Do you support or oppose the provision?

Support

Oppose

| Submission | Decision Sought |
|---|---|
| <p><i>State in summary the nature of your submission and the reasons for it.</i></p> <p>I object strongly to the disclosure of private financial information. What purpose does this serve.</p> | <p><i>State clearly the decision and/or suggested changes you want Council to make on the provision.</i></p> <p>I seek to have this provision deleted</p> |

ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION

Section number of the Plan Change: 3.11.5.7 Non-complying activity rule - Land use change

Do you support or oppose the provision?

Support

Oppose

| Submission | Decision Sought |
|--|---|
| <p><i>State in summary the nature of your submission and the reasons for it.</i></p> <p>No opportunity has been available to submit on this rule implemented on 22nd October 2016. This unfairly restricts future land uses, which creates land value equity loss.</p> | <p><i>State clearly the decision and/or suggested changes you want Council to make on the provision.</i></p> <p>Delete this rule in its entirety.</p> |

Section number of the Plan Change: 3.11.4.2 Farm Environment Plan

Do you support or oppose the provision?

Support

Oppose

| Submission | Decision Sought |
|--|--|
| <p><i>State in summary the nature of your submission and the reasons for it.</i></p> <p>Farmers are further financially burdened by the requirement to have a Farm Environment Plan prepared by a Certified person.</p> <p>The robust Third Party Audit (independent of the farmer and Certified Farm Environment Planner) will be an addition cost to the farmer.</p> <p>The compliance required to farm requires greater input than the actual physical farming.</p> | <p><i>State clearly the decision and/or suggested changes you want Council to make on the provision.</i></p> <p>Delete the requirement to have a farm plan prepared by a Certified Farm Environment Planner.</p> |

ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION

Section number of the Plan Change: 3.11.2 Objective 5 : Mana Tangata

Do you support or oppose the provision?

 Support Oppose

| Submission | Decision Sought |
|---|--|
| <p><i>State in summary the nature of your submission and the reasons for it.</i></p> <p>All farmers should be treated equally, no provision for Tangata Whenua should be granted.</p> | <p><i>State clearly the decision and/or suggested changes you want Council to make on the provision.</i></p> <p>Treat all parties equally.</p> |

Section number of the Plan Change:

Do you support or oppose the provision?

 Support Oppose

| Submission | Decision Sought |
|---|--|
| <p><i>State in summary the nature of your submission and the reasons for it.</i></p> <p>3.11.5.2 Permitted Activity Rule Para 4, c. No part of the property or enterprise over 15 degrees slope is cultivate or grazed:</p> <p>This rule is unrealistic and will have serious negative impacts for farming in New Zealand and the economy of New Zealand.</p> | <p><i>State clearly the decision and/or suggested changes you want Council to make on the provision.</i></p> <p>Delete rule.</p> |

I support the concept of Health Rivers, but this responsibility should not be shouldered by farmers alone. The Waikato Regional Plan Change 1 – Waikato and Waipa River Catchment plan does not include any reference to urban dwellers or business. Waste water discharge into the Waikato River, from non-farming activities does occur, why is this not addressed in the plan.

We own a 100ha season supply dairy farm milking 260 cows. A 40ha run-off grazing 120 replacement heifers and some beef animals. We lease a further 30ha, used for winter grazing and to grow grass and maize silage for our dairy farm.

We operate a DairyNz System Two dairy farm, with minimal external feed inputs. Those we do feed are grown on our run-off and lease land consist of grass and maize silage. Our nitrogen reference point for the past two years as per our Fonterra Nitrogen Report is relatively low. This is due to the financial constraints of a low dairy payout for the last two year.

We have undertaken the following environment projects in the last 5 – 10 years and consider that we farm to mitigate environment impact:

- Fencing of drains to exclude livestock, approximately cost \$15,000
- Upgrading our effluent system with the construction of a new plastic lined pond, approximately \$100,000. Installation of a new sump and pump. This supports our land based system.
- Tree plant
- Stand cows off the pasture in very wet weather to minimise soil erosion.
- Once-a-day milking –

We have no immediate plans to expand our current arming operation by either increasing stock rate or changing our farming system, but do not want to be restricted by the constraints of the Health Rivers Plan. I intend to further extend our land based effluent spreading systems to provide a large area to disperse the effluent.

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

- The significant negative effect on rural communities
- The cost and practicality of the rules.
- The effect that the Nitrogen Reference Point will have on my business and my economic wellbeing.
- 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