

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 also</i>
Emailed to	healthyrivers@waikatoregion.govt.nz <i>Please Note: Submissions received my 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	Philip David Francis Butler & Lois Elizabeth Butler		
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Email	butlerpl@farmside.co.nz	Phone	0272477008
		Fax	

ADDRESS FOR SERVICE OF SUBMITTER			
Full name	As above		
Address for service of person making submission			
Email	Phone	Fax	

PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION
<input checked="" type="checkbox"/> I 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



Date

7.03.2017

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.

SUBMISSION POINTS: General comments

We own a [Dairy Farm & dairy support block this is 215 ha's milking 520 cows the support block is 37ha's used mainly for supplements & wintering cows. We are in the Upper Waikato catchment.

We operate a medium input dairy farm stocked at around 2.7 cows to the hectare; we also carry our rising 1 year calves on the dairy platform through till the 1st of May each year. We have always operated our business as a sustainable one with both economic & environmental carrying similar weight. We are reasonably debted but have always had a policy of continuous improvement when it comes to looking after our land & constantly seek ways to improve this. Whilst dairy payout has impacted on our ability at times to carry some of this out we have set goals & aspirations to improve our environmental footprint. We were involved in a local project known as "Tomorrow Farms Today" this gave us scorecard for both our Environmental operation & Economical part of our business. This project gave us some comfort in the system we have been operating is profitable whilst also being sensitive to our Environment. We utilise our support block mainly during the winter period & then to cut & carry some supplement back to our dairy platform.

In the future, I plan to continue operating our business in similar vein to its current situation, we are looking at investing more in our effluent management mainly in improved storage & extension of the irrigation system. We believe this will be a substantial investment & obviously will need a number of years to gather a return on this. We are concerned that some of the rules proposed will undermine the value of our properties & will in turn lead to a drop in our equity which will put our whole business & livelihood in jeopardy. Overall we want to continue to operate a sustainable business that enables a continued farming legacy. We agree with the plan in terms of maintaining & improving the rivers & streams that we all use.

I am concerned about the following issues with PC1 , firstly as mentioned above we are concerned on how the implementation of these rules will affect our farm values & in turn our equity & how the bank will view our overall business. We are also concerned at the ability or flexibility we will have taken away from us in how operate & manage our farm on a day to day basis. This is mainly around the use of nitrogen as a low cost form of growing feed particularly in low periods of growth in our calendar year. We believe that we will have to buy more feed in at times which will be at a higher cost. We are not large N users but feel that the way the plan has proposed to set our Nitrogen use is quite unfair & question whether a "number" in a certain season is the best way to manage this. We have as mentioned been working for a number of years to lower our N use in an economical way & feel that we will be penalised under the changes for doing this work. It appears to us that we would have been far better off to have continued to be a large N user & landed in the top 75th quartile, this would under PC1 still allow us to have the ability to use a higher level of N if required.

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

I 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
40	Rule 3.11.5.2 Permitted Activity Rule – Other farming activities			
41	Rule 3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	OPPOSE	Amend 3.11.5.3 as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including</p> <p>Our main concern here is as I have mentioned earlier is the fact that the plan restricts & impacts on the flexibility we have in our business to use nitrogen as a tool to grow grass. We have concerns around a number & believe that continuing farm practices that allow us to lower N use through practical & science based ideas, is a more viable option. This includes lower stocking rate, use of N as a liquid combined with gibberellic acids . Wintering cows off farm, using low N leaching pasture species.</p> <p>The dates chosen are not fair to our industry as they coincide with two very low payout years & therefore our overall spend on N in these years was well down due to economics.</p> <p>I am also concerned that this is not practical because The timeframe around having qualified people available to prepare these FEP's is too short; this is another added cost which we currently do via our milk supply company</p>

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
45	Rule 3.11.5.7 Non-Complying Activity Rule – Land Use Change	OPPOSE	Amend 3.11.5.7 as requested by Federated Farmers in their submission.	<p>This proposal will have the possibility to impose significant costs & loss of opportunity on my farming activities as it takes away the flexibility I currently have with our support block. We may want to bring our rising 2year heifer's home & not cut as much supplement here.</p> <p>We could purchase neighbouring land & look to combine this land & run another enterprise on here. Our main overall concern again here would be to the value of this land as it is only able under the plan able to be farmed how it currently is, or with some sort of mitigation, this again may impact on our overall equity or viability.</p> <p>I am also concerned that this is not practical because Over time I think this rule is too restrictive & will lead possibly to lost opportunities to create wealth in our communities.</p> <p>If we look at the changes to the farming landscape in the last 22 years we have farmed here you would have to say that these rules will only stifle economic growth. And this may not be at the expense of the environment as today in our business we spend a significant more now on our farm environmentally and are alot more environmentally aware than we ever were in the past.</p>
46	Schedule A: Registration with Waikato Regional Council			

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
47	Schedule B: Nitrogen Reference point	OPPOSE	Amend Schedule B as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including as mentioned the ability for us to maximise the production on our farm.</p> <p>We have concerns around the use of a nitrogen reference point this is mainly around how this number is arrived at. As mentioned earlier the proposed process to get to this number seems unfair. Why have a number??? Is a reference year or years appropriate??</p> <p>Is the overseer programme the right programme for this?? Do we need more science??</p> <p>We have already utilised new management practices in the way we apply nitrogen (from solid to liquid) & believe that we will be quite stifled in our ability to be flexible in the management of our property if reference points are fixed.</p>
50	Schedule C: Stock Exclusion	OPPOSE	Amend Schedule C as requested by Federated Farmers in their submission.	Fencing of waterways is not a concern on our particular property but do have some concerns here for many of the drystock farms & the practicality of fencing their waterways. Are we better to maybe have certain stock restrictions in some of the steeper areas??

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51	Schedule 1: Requirements for Farm Environment Plans	OPPOSE	Amend Schedule 1 as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including greater use of consultants to prepare these plans. We are concerned at the long term costs as ratepayers as to how to police this extra compliance.</p> <p>We currently prepare a nutrient budget with our farm consultant & fertiliser representative, this is a useful document that allows us to manage all our nutrients. This allows us to maintain the right amount of nutrients we require on our farm; this is beneficial both economically & environmentally.</p> <p>We would also have to question the timeframes required for these plans to be implemented. Are there enough qualified consultants??</p>