

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.

Also e-mailed prior to due date.

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		
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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.
<input type="checkbox"/> 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

Handwritten signature in black ink, appearing to read "A. Harris".

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.

SUBMISSION POINTS: General comments

We own a 215 ha drystock property in sub-catchment 3. Our stocking rate varies depending on the season and the markets. A large part of our farming enterprise is trading lambs, heavily dependent on feed supply. We do not currently have a NRP.

We only took over the farm 2 years ago and during that time have already done extensive riparian fencing and improved the water reticulation on the farm (at a cost of \$28,000.00 for fencing alone, not including the costs of planting or installation of new troughs, culverts and crossings, and water reticulation which we expect to be an added \$30,000.00) We are already committed to fencing off our waterways to protect the environment but have only completed about 50% of the fencing. We estimate another \$50-60,000.00 will be required to complete it.

In the future, we have no plans to convert to dairy farming or purchase a dairy farm but would like to expand my current farming enterprise. We like to have the flexibility to be able to alter our stocking policy to meet the market .e.g. more sheep or more cattle depending on which has the best return.

In principle we support the Healthy Rivers Plan and as drystock farmers feel we are already farming conservatively, with our effects on the environment in mind. It would seem however that drystock farmers who already have a much lower impact on the environment are going to be more disadvantaged compared to dairy farmers under this plan (i.e. dairy farmers can continue to farm with a higher NRP while drystock farmers are unable to increase theirs)

We are also concerned about the following issues with PC1:

- The costs involved in becoming compliant (fencing and having a FEP made up) will be significant, plus there will be ongoing costs associated with ongoing monitoring (audits).
- The other concern for us is the method of working out your NRP and then that is what you are stuck with for the foreseeable future. Your NRP may be low due to a number of reasons out of your control (for example in our case the previous owners destocked because they were selling and we farmed conservatively the first year as we did not know the farms capabilities).
- Also looking to the future there is concern over how this process will affect our farm value . Plus if we wanted to purchase another property within the catchment is there going to be clarity and transparency regarding that properties progress within the process of becoming compliant with the Healthy River Plan?
- In general implementation of this plan is going to mean more time and money spent on compliance documentation.

We support the submission that has been lodged by Federated Farmers. In particular:

- 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 plan significantly exceeding the 10 year targets in many attributes and areas

- The lack of science and monitoring at the sub catchments level

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			

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
42	Rule 3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme			
44	Rule 3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production			
45	Rule 3.11.5.7 Non-Complying Activity Rule – Land Use Change			
46	Schedule A: Registration with Waikato Regional Council			

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47	Schedule B: Nitrogen Reference point	OPPOSE	Explore more fair options to grant a NRP – or be prepared to alter this if it seems to have been unfairly allocated.	<p>The NRP you are allocated depends on historical data and in some cases you may end up with a low NRP. For example if you have just purchased the farm and are unable to get the previous farmers data you are left with the default figure. In our case when we purchased the farm in 2015 the farm had been destocked to sell and therefore the NRP reached may not be a fair representation of the true farming activity.</p> <p>There are so many variables that affect the final value that it seems an unfair way of arriving at a figure you are going to have to farm within for the foreseeable future.(especially for drystock farmers) We purchased the property with plans to further develop it as a dry stock property (NOT convert to dairy). We are already farming with a much lower NRP than an average dairy farm anyway.</p> <p>The NRP affects your stocking rate, how much fertiliser you can apply –thus affecting profit margins on the farm.</p> <p>It limits future options for farming and also ultimately can severely adversely affect the property value(as in the Lake Taupo catchment)</p> <p>Also is Overseer fit for purpose? It would appear to have many limitations.</p> <p>We support the 5 year rolling average for the NRP. As stock traders this will allow us to alter our farming practises to meet the market and allows for some leeway to be able to utilise feed in the good years.</p>

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50	Schedule C: Stock Exclusion			<p>We are not opposed to excluding stock from waterways but the cost (as outlined previously) is very significant. This proposal will impose significant costs on our farming activities including putting in new troughs and water reticulation. We will need to replace our water pump to meet the demand for water. In a good year we may be able to afford this but drystock farming does not have a guaranteed income and is a very challenging business. We have already completed some riparian fencing on our farm at a cost of around \$28,000 so far (this does not include any planting or the reticulation we had to put in to supply water to the stock) We have been very fortunate in being able to secure some funding for this but still the costs have been significant for us. For some farmers who have many kms of fencing to do the costs and logistics may be very overwhelming.</p>

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51	Schedule 1: Requirements for Farm Environment Plans	OPPOSE	Keep the 5 year rolling average for the NRP	<p>This proposal will impose significant costs on my farming activities including the cost of actually having a FEP made up and then the ongoing financial and time commitments involved in auditing.</p> <p>Are there going to be enough consultants available to actually do these plan?</p> <p>We have not yet done a nutrient budget and still have to have our farm mapped –again extra costs.</p> <p>On this farm which is a hill country farm avoidance of cultivation on slopes > 15 would be difficult thereby only leaving us with direct drilling as a method of cultivation, further affecting our options and ability to maximise production of our stock with crops.</p> <p>The cultivation setbacks and fencing setbacks seem feasible –on this property.</p>

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