

# 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	
<b>FOR OFFICE USE ONLY</b>			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

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

## SUBMISSIONS CAN BE

<b>Mailed to</b>	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
<b>Delivered to</b>	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
<b>Faxed to</b>	(07) 859 0998 <b>Please Note:</b> if you fax your submission, please post or deliver a copy also
<b>Emailed to</b>	<a href="mailto:healthyrivers@waikatoregion.govt.nz">healthyrivers@waikatoregion.govt.nz</a> <b>Please Note:</b> Submissions received by email must contain full contact details. We also request you send us a signed original by post or courier.
<b>Online at</b>	<a href="http://www.waikatoregion.govt.nz/healthyrivers">www.waikatoregion.govt.nz/healthyrivers</a>

**We need to receive your submission by 5pm, 8 March 2017.**

## YOUR NAME AND CONTACT DETAILS

Full name Grahame and Kim Shearer		
Full address 1677 Broadlands Road RD1 Reporoa		
Email <a href="mailto:gk.shearer@clear.net.nz">gk.shearer@clear.net.nz</a>	Phone 0272333447	Fax

## ADDRESS FOR SERVICE OF SUBMITTER

Full name GKS Farms Ltd		
Address for service of person making submission 1677 Broadlands Road RD1 Reporoa		
Email <a href="mailto:gk.shearer@clear.net.nz">gk.shearer@clear.net.nz</a>	Phone 0272333447	Fax

## PLEASE INDICATE 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.

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 6/3/17

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 have farmed in the Reporoa district for over 20 years, mainly dairy, but in the latter years some dry stock as well. Our dairy farm is within the Priority 1 area as identified by this plan. We own a 170ha dairy farm milking 530 cows, a 25ha runoff (priority 3) and a 200ha runoff (Priority 3) which runs all of our young stock, carryovers, small herd of steers and winters our dairy herd over winter.

We live on the banks of the upper Waikato River and enjoy using the river for leisure activities, the water is clear and pristine and we would like to keep it that way.

Our current stocking rate on the dairy farm is 3.2 cows per hectare, we are unsure of what our Nitrogen reference point is as there is much variation with each season and all the elements that contribute to this are changing on a regular basis. We have full compliance for fencing off all our waterways and streams and have native plantings along our main waterway. Although we have had some assistance with fencing off these waterways, we have had extra financial costs of labour, materials and cost of time for our staff and ourselves to meet this compliance.

In the future, we are unsure about the plans for our farm but we would like to remain the only decision makers in regards to how we utilise our land. We are committed to maintaining stock free waterways and protecting our environment and will continue to comply with current regulations surrounding our industry.

I am concerned about the following issues with PC1 including the day to day implications for our farming operation, and the increased financial outputs in order to comply with the stated changes in the Plan Change 1. The time frames for compliance are unrealistic within our farming operation and do not take into account the variations in each season such as a drought. We are concerned about the fact with all the compliance it well exceeds the 10 year targets and are many cases unachievable. Also the science that has been attributed to the plan does not correspond in all the facts that have been presented.

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	<b>OPPOSE</b>	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: Being compliant with new fencing requirements will require huge financial costs in time, labour and materials replacing fences that currently meet industry regulations.</p> <p>I am also concerned that this is not practical because some of my farm is around 15 degree, and although this is not ideal, we would like to be able to put some of this land into crops and or regrass on a rotational basis. The Nitrogen leaching requirements do not take into account the seasonal changes that affect farming such as excessive rainfall or drought which drastically changes our N levels due to our porous pumice soils.</p>
42	Rule 3.11.5.4 Controlled Activity Rule	<b>OPPOSE</b>	Amend 3.11.5.4 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities including This proposal will impose significant costs on my farming activities including:

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	<p>– Farming activities with a Farm Environment Plan not under a Certified Industry Scheme</p>			<p>Being compliant with new fencing requirements will require huge financial costs in time, labour and materials replacing fences that currently meet industry regulations.</p> <p>I am also concerned that this is not practical because some of our farm is around 15 degree, and although this is not ideal, we would like to be able to put some of this land into crops and or regrass on a rotational basis.</p> <p>The Nitrogen leaching requirements do not take into account the seasonal changes that affect farming such as excessive rainfall or drought which drastically changes our N levels due to our porous pumice soils.</p>
44	<p><b>Rule 3.11.5.5</b> Controlled Activity Rule – Existing commercial vegetable production</p>			

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45	<b>Rule 3.11.5.7</b> Non-Complying Activity Rule – Land Use Change	<b>OPPOSE</b>	Amend 3.11.5.7 as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including taking the rights of farm owners to use their own land for the farming activity that best suits the land, financial and personal circumstances. It reduces the farm owner's ability to manage the land in the best practical way for themselves and the environment.</p> <p>I am also concerned that this is not practical because seasonal changes in both farming and personal situations vary and it is impractical for landowners to sign away any right they have to change their farming operation.</p>
46	<b>Schedule A:</b> Registration with Waikato Regional Council			
47	<b>Schedule B:</b> Nitrogen Reference point	<b>OPPOSE</b>	Amend Schedule B as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including not having the ability to fertilise our land that is the most practical and economical for the land use in order to grow the grass that is required to feed our animals to the perform at the best of their ability. Areas of the farm that are performing poorly can be developed using appropriate levels of fertiliser, this impacting on the animals producing performance and the financial bottom line for our business and our livelihood.</p> <p>The impact nitrogen loss restrictions will have on the resilience of our farming business and our ability to be market leaders with our raw product is both financial and have far reaching impact in the way we run our</p>

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				<p>operation and being able to maintain our business integrity.</p> <p>The impact of nitrogen loss restrictions will impact on our ability to change your farming system so that we can put other mitigations in place that reduce losses of sediment, phosphorus, or pathogens, and will decrease our ability to fund such environmental mitigation.</p> <p>I am also concerned that this is not practical because seasonal changes in both farming and personal situations vary and it is impractical to ask landowners to take on further financial and physical burdens in order to meet unrealistic targets.</p>
50	<b>Schedule C: Stock Exclusion</b>	<b>OPPOSE</b>	Amend Schedule C as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including financial, staff and time restrictions, in order to meet the newly proposed changes.</p> <p>Most NZ farmers have already fenced their waterways to current standards at a great cost to the farmer. These fenced waterways are often overgrown and as plants and weeds are creeping into the waterways, reducing water flows. Some waterways are meant to be maintained by local council which often doesn't occur so farmers have to take it on themselves to maintain these as well as all the other tasks required of them.</p>

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51	<b>Schedule 1:</b> Requirements for Farm Environment Plans	<b>OPPOSE</b>	Amend Schedule 1 as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including whether these plan requirements are actually feasible for example avoiding cultivation of land which is greater than 15 degrees. Farm environmental plans will prove to be costly and the regulation around who will do these plans and conformity of plans across the board (one size does not fit all).</p> <p>I am also concerned that this is not practical because of seasonal changes and the changing landscape of farming varies so much month the month season to season, an environmental plan will be ineffective as a snapshot of any farming operation. Also individual plans could benefit some more than others, the plan needs to be across the board.</p>

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