

**WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 -  
WAIKATO AND WAIPA RIVER CATCHMENTS**

**Submission Form**

Submission on a publically 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

**To:** Waikato Regional Council  
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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.**

**If others make similar submissions, I would consider presenting a joint case with them at the hearing.**

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## WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

### Introduction

Thank you for the opportunity to submit on the Waikato Regional Councils proposed Plan Change 1.

My name Andrew Clark. Since 1992 we have farmed 54 ha on the south-eastern slopes of Mt Pirongia. The property is near the headwaters of two mountain streams, the Mangarewarewa and the other un-named. Until 2013 I farmed the property myself running dairy heifers and a few beef cattle of our own. The number of stock carried gradually increased as fertility improved and we were usually running between 18 and 24 SU/HA depending on the number of heifers my client had available. All supplement was made on farm (approx.. 160-180 bales of haylage). In 2013, for health reasons, we leased the farm on 3 by 3 year lease to two neighbours as a grazing lease with myself still being responsible for maintenance, fertilizer and fencing. The farm is divided 8 ha/39 ha between the lessees.

Most of the streams are fenced off from stock access with the rest being done as finance allows. There are three small patches of native bush which used to be under a Waipa Valley Authority covenant but are now under QE 2. Some other areas have been fenced off too and allowed to regenerate in native trees with some additional planting as well.

Until recent years we used RPR fertilizer with minimal amounts of added urea mixed with it. Unfortunately the supply of RPR is now unreliable so we are having to use processed fertilizer. Urea has never been used by itself.

No further development is planned under the current ownership.

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
Schedule B	I oppose the use of Nitrogen Reference Points entirely and most aspects of the way in which they are to be calculated in this schedule	<p>Overseer was never designed to be a regulatory tool and will not accurately measure the discharges from a farm.</p> <p>The reference dates are too restrictive and do not take into account the changing circumstances of a farms management.</p> <p>Dairy grazing does not necessarily fit in with a farms financial year and generally the stock do not appear in the farm accounts</p>	<p>Use accurately measured FMU'S</p> <p>Take the average of any two years from 2010 to 2016</p> <p>Use accurate stock numbers like those from invoices sent to clients</p>
Schedule B, Table 1	I oppose the method to be used if data is not available	As I lease the farm I do not have the stock numbers from the required years so apparently will be allotted 75% of normal FMU's. This could severely restrict production on my farm and will not reflect the actual discharges.	Take accurate FMU readings from farms and then all farms will be equal. It will also identify more accurately the sub-catchment discharges.



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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.

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
Provision/ 3.11.5.3 (2) Nitrogen Reference Points	I oppose	The reasons for this are:  Nitrogen Reference points are an inaccurate way of determining discharges from individual properties.	I seek that the provision is: Deleted in its entirety.  As an alternative I propose using FMU's taken from individual farms and while this may be a more difficult process it will give a truer reading of a farms discharge and be less likely to restrict production.
3.11.5.3 (5) Farm Environment Plans	I support in principle with reservations	My main concern about these is the exorbitant cost especially relative to the incomes of smaller enterprises. I don't have a spare 4-5000 dollars to pay for one of these.	I am sure that there is a less expensive way to determine a farms discharge and provide a plan to mitigate those discharges.

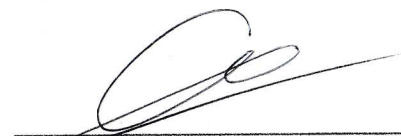
WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:

Yours

Print Name:

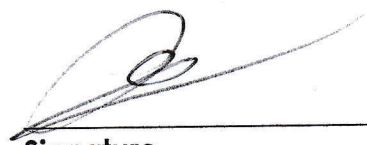
Andrew Clark

  
Signature

6<sup>TH</sup> March 2017  
Date

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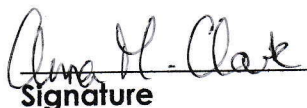
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Signature

6<sup>th</sup> March 2017

date



Signature

6<sup>th</sup> March 2017

date