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 ***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		
Full name Colin and Shelley Guyton		
Full address 3769 State Highway 5, RD2 Reporoa		
Email guytonfarms@xtra.co.nz	Phone 027 2756546	Fax nil

ADDRESS FOR SERVICE OF SUBMITTER		
Full name C & S Guyton Farms Limited		
Address for service of person making submission		
Email	Phone	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 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 7th March 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

I own a 141 ha dairy farm and lease another 200 ha of Maori Land in the Upper Waikato River catchment.

I run a relatively low cost dairy farm. I milk off approx. 240 of land (some my own and approx. 100ha of Maori lease.) I run approx. 2.7cows per Hectare and have my calves on the milking platform until May. I also have the use of about 80Hha of Maori land as support some 13 KM from the home farm. I recently put in a lined pond and have done extensive wetland plantings with the assistance of various community organisations. The main Wetland would have cost in excess of $160,000, but we have done several other smaller wetlands as well.

In the future, I plan to invest in more wetland developments and as far as farming operations I would like flexibility to use the land that offers the best return in the circumstances we find ourselves in.

I am concerned about the following issues with PC1

A) Cost to the business in lost production, increase costs, compliance cost and land value decreases.
B) The ability for WRC to monitor and do the work required under this plan.
C) The steepness of land.....i.e. 15 degrees is relatedly flat in my opinion.
D) Is Nitrogen even an issue....appears we can do a lot concentrating on the Phosphate, sediment and pathogens? Do we even need a NRP

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.	This proposal will impose significant costs on my farming activities including Compliance costs. Ability to be flexible. The time frame to get FEP seems unlikely to happen as what frame work is in place for this to happen. (There needs to be a lot of trained people on the ground and on the same page). Although I think I will fall inside the 75% N figure. We do not know what that figure is and overseer is up and down like a yoyo as each new version comes out. It would be difficult for us to lower out N leaching as we are already fairly low cost farming and low stocking rate. I think FEP will be a good step to take as long as the approach is to look at issues the farm has and prioritise with fair time frames and allowances for pay-out lows

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				and weather extremes that effect income. They need to be brief and simple to follow.
42	**Rule 3.11.5.4** Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	**OPPOSE**	Amend 3.11.5.4 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities including Compliance costs. Ability to be flexible. The time frame to get FEP seems unlikely to happen as what frame work is in place for this to happen. (There needs to be a lot of trained people on the ground and on the same page).

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44	**Rule 3.11.5.5** Controlled Activity Rule – Existing commercial vegetable production			

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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.	This proposal will impose significant costs on my farming activities including as a current support block has not been farmed to its full potential. We should be considering that flat fertile land should be used in a way that reflects the needs of the economy at the time. It is short sighted to limit a land to a particular land use because we have no idea what the future will bring. We need to seriously investigate a way forward with land use policy. Understand that a short term Rule is necessary, but long term needs a lot more thought moving forward.
46	**Schedule A:** Registration with Waikato Regional Council			
47	**Schedule B:** Nitrogen Reference point	**OPPOSE**	Amend Schedule B as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities including A) Inability to react to market...rear younger stock etc. B) The seasons picked to decide our NRP (2013/14 or 2014/15) were not good ones ...low pay out and weather effected. C) I believe "the science" shows we can improve water quality by dealing with Phosphate, sediment and pathogens. Nitrogen could be dealt with by way of good practice in the FEP.

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				D) Use of overseer to decide NRP is not what overseer was designed for. It is not a regulatory tool. E) We need to consider whether mitigation causes us long term to lose our overseas advantage. I.e. pasture fed cows verses barn fed cows. F) I am concerned that the NRP way of allocating a resource if you like is a form of grand parenting and that in the future farmers with a higher level of N leaching may be rewarded, while other farmers who have been thinking about the environment will be disadvantaged. G) If we have to have an N number.....seems fairer that we have a band (land use band) that we should fall in. If you're above over time you need to mitigate to get down into that band. H) I am concerned that NRP could have a huge negative effect on the value of my land and if so we need to have the ability to be compensated. I) If land values drop there will be an effect on the debt/equity ratios. J) If the only way forward is to build infrastructure i.e. Herd homes etc. Then we have loss the one thing that makes us different from our competitors. Grass fed cows, outside and as close to natural as possible. Let's not lose that advantage.