

Healthy Rivers submission continued. Page six of seven.



8th March 2017.

Further comments.

As outlined above, the proposed plan change would make my farm totally uneconomic.

If somehow I had concentrated on this plan change rather than setting up my new dairy farm, then perhaps I could have gone to the bank, borrowed enough money to dump a huge amount of nitrogen fertiliser on the farm.

Then I could have continued to farm into the future with confidence. Confidence in meeting inequitable rules. But not in confidence that the Waikato river system was being protected.

The proposed ten year time frame for the plan creates incredible future uncertainty. If, somehow, I were to be able to continue farming under the current plan - as some sort of subsistence existence - then any future tightening of rules in a similar inequitable way (for example a blanket percentage reduction in nitrogen leaching) would make "toughing it out" for ten years a waste of effort.

Mitigation:

Waikato Regional Council (WRC) staff were unable to clarify for me how mitigation could be applied. Apparently the plan change is not detailed enough.

I note that the stream below my farm is already highly degraded (WRC monitoring upstream of my farm on the Opuatia at "Two Bridges") despite the stream running out of beef, sheep and forestry blocks.

I note that the stream adjacent to my farm usually has large number of koi carp which create large sediment plumes. I think that allowing me to apply mitigation of either financial kind or physical work (catching the carp) could benefit the Waikato river system and overall improve the environment.

The plan needs to specifically allow for such endeavors. This could be a partial solution to my concern over the nitrogen leaching restrictions.

Overseer:

Linking Nitrogen leaching rules to Overseer directly creates potential problems. Horizons One Plan is facing this issue now. The Waikato should avoid this.

Equity between landowners:

I note that my neighbour on five acres has 2 horses and 2 milking cows. The stocking rate is much higher than mine and so will be the nitrogen leaching per hectare. But size of the farm excludes them from evaluation under the same rules as myself. This is both inequitable and not protecting the environment.

Gifting (grandparenting) nitrogen leaching rights to farms with current high nitrogen losses, whilst restricting farms like my own from adopting farming best practice is both inequitable and does not protect the environment.

All I am asking for is to be allowed to farm with a nitrogen leaching "allowance" of no more than the regional average for dairy farms. I do not believe forcing me to apply for a resource consent to continue farming would be fair. It would have no certainty of success. And my wider neighbours could continue to damage the water quality without significant restriction on their activities.

Page seven of seven.

PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 WAIKATO AND WAIPĀ RIVER CATCHMENTS



Submission form on publicly notified – Proposed
Waikato Regional Plan Change 1 – Waikato and
Waipā River Catchments.

Important: Save this PDF to your computer before answering.
If you edit the original form from this webpage, your changes
will not save. Please check or update your software to allow
for editing. We recommend Acrobat Reader.

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

SubForm	PC12016	COVER SHEET	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

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 to one of the above addresses
Emailed to	healthyrivers@waikatoregion.govt.nz Please Note: Submissions received by email must contain full contact details.
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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TRADE COMPETITION AND ADVERSE EFFECTS (select appropriate)

- I could / could not gain an advantage in trade competition through this submission.
- I am / am not directly affected by an effect of the subject matter of the submission that:
- adversely effects the environment, and
 - does not relate to the trade competition or the effects of trade competition.

Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO

Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1 (Continue on separate sheet(s) if necessary).

Whole plan.
Nitrogen rules.
Ten year life of plan.

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

(Select as appropriate and continue on separate sheet(s) if necessary).

- Support the above provisions
- Support the above provision with amendments
- Oppose the above provisions

MY SUBMISSION IS THAT

Tell us the reasons why you support or oppose or wish to have the specific provisions amended. (Please continue on separate sheet(s) if necessary).

Simply, the current plan would bankrupt me.

I converted a small farm (200 acres) to a dairy farm. I started milking late 2014. The two reference years for nitrogen I milked herds of 52 and 86 cows. These numbers were low as I was building up my herd, building up dairy farm experience, and the payout was low so there was no significant advantage to push for higher production. About 5 kg N per hectare of nitrogen fertiliser was applied each of these two seasons.

Under the plan, it would seem that I could not increase my milking herd to a size that would generate a workable profit. If I (or a future buyer) converted to beef production there would still be a limit of the herd size well below the farm carrying capacity. So the property value would decrease substantially.

Hence I would be unable in future to farm my way out of debt nor sell the property to recover my debt. This would eventually bankrupt me.

I note with interest a recent DairyNZ article "Principles from Pastoral 21: Optimising dairy system strategies to meet nutrient limits" in Technical Series in Brief, March 2017, pages 9 to 13.

The control Waikato farmlet leached nitrogen of 60 kg N/ha. The alternative system had a loss of 34 kg N/ha. These are average values from a five year trial. Though the values are measured, not Overseer calculated. My farm, from Overseer calculations done by Fonterra, already leaches nitrogen lower than the massively improved system in the study above. Under the proposed plan change, my farm would be totally uneconomic. continued on additional sheets.

I SEEK THE FOLLOWING DECISION BY COUNCIL

(Select as appropriate and continue on separate sheet(s) if necessary).

- Accept the above provision
- Accept the above provision with amendments as outlined
- Decline the above provision
- If not declined, then amend the above provision as outlined

PLEASE INDICATE BY TICKING THE RELEVANT BOX 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.

JOINT SUBMISSIONS

- If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

- Yes, I have attached extra sheets. No, I have not attached extra sheets.

SIGNATURE OF SUBMITTER

Signature:

Date:

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.

PLEASE CHECK that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION

Section number of the Plan Change: whole plan

Do you support or oppose the provision?

Support

Oppose

Submission

Decision Sought

State in summary the nature of your submission and the reasons for it.

State clearly the decision and/or suggested changes you want Council to make on the provision.

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