

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 <i>Please Note: if you fax your submission, please post or deliver a copy also</i>
Emailed to	healthyrivers@waikatoregion.govt.nz <i>Please Note: Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.</i>
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 Alastair Neville		
Full address: 197 Springs Road RD2 Reporoa 3083		
Email mountviewfarmingtrust@gmail.com	021 366 873	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name: C&A Neville Family Trust		
Address for service of person making submission: 115 Springs Road RD2 Reporoa		
Email mangoatlumbia@yahoo.co.nz	Phone 07 333 8662	Fax

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



Date 08/03/2017

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 150ha dairy farm milking 300 cows in the priority 3 sub-catchment.

Our farm runs on average 300 cows and 90 head of young stock all year round. We make 400tDM of supplementary feed on the platform and grow 110tD of summer crop. Our current N reference point is 29 and we achieve this through having a low stocking rate and low N fert inputs. We have fenced off our waterways in accordance to the Fonterra clean streams accord. We have also invested around \$250,000 on building a covered feedpad to utilise our supplements more and have further control on our grazing and effluent management.

In the future, I plan to expand my current operation by means of increasing cow numbers on this platform in conjunction with obtaining a nearby support block. This means we can capitalise on using our current high-performing platform to carry more cows and increase profitability for our operation. This will create opportunities to put more emphasis on environmental projects such as riparian planting, trees on marginal land etc on both the dairy platform and any other supporting platforms in the future.

I am concerned about the following issues with PC1. The main concerns would be the added costs and lost profit generating opportunities associated with the proposed changes especially in regards to nutrient limits and land use. Businesses like ours could be at a disadvantage when it comes to N limits based on previous years data. We are already at a low N leaching level and have been for several years. This would almost be a handicap to us now going forward if our current levels were to become a benchmark. This would make intensification or up-scaling our business incredibly difficult.

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 n farming activities including. <ul style="list-style-type: none"> • Time and consultancy costs, both to those the farmer and regional council staff • Benchmarks will be not based on typic season figures – e.g. benchmark figures ar likely to be influenced by financial and climat factors e.g. reduced dairy payout, advers weather events e.g. droughts.

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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 farming activities including <ul style="list-style-type: none"> • Time and consultancy costs, both to those the farmer and regional council staff • Benchmarks will be not based on typical season figures – e.g. benchmark figures are likely to be influenced by financial and climate factors e.g. reduced dairy payout, adverse weather events e.g. droughts.
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	OPPOSE	Amend 3.11.5.7 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on farming activities including <ul style="list-style-type: none"> • Time and consultancy costs, both to those the farmer and regional council staff • Benchmarks will be not based on typical season figures – e.g. benchmark figures are likely to be influenced by financial and climate factors e.g. reduced dairy payout, adverse weather events e.g. droughts.

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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.	<p>This proposal will impose significant costs on n farming activities including</p> <ul style="list-style-type: none"> • Lost opportunity to generate income – <p>Having restrictions placed on Nitrogen use ar land use will result in having a limited ability intensify our land use. We will struggle to offs increasing overhead costs and debt servicing we don't have the ability to increase profitabili through intensification of our current system.</p>
50	Schedule C: Stock Exclusion	OPPOSE	Amend Schedule C as requested by Federated Farmers in their submission.	

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
51	Schedule 1: Requirements for Farm Environment Plans	OPPOSE	Amend Schedule 1 as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on n farming activities including:</p> <p>Cultivation – Around 20% of our land has slope greater than 15 degrees. This is significant cropping and regrassing area which have the capability increasing our overall dry matter production. Limiting the ability to cultivate these slopes removes the ability of this land to be more productive.</p> <p>Time and Financial costs of Farm Environment plans</p> <p>Farmers time cost of putting together FEP = \$1000/h Time requirement to put plan together = 3-5 hours estimate Financial return of said plan = ?????? Consultants charge =\$1000's/hour</p> <p>Farmers return on time spent making proper farm related operational decisions = \$10,000's to \$1,000,000's</p> <p>It is more practical for Farmers to be focused on operational decisions as opposed to working for Regional councils.</p>