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 Karen Barker		
Full address [redacted] Reporoa		
Email: [redacted]	Phone: [redacted]	Fax n/a

ADDRESS FOR SERVICE OF SUBMITTER		
Full name: Karen Barker		
Address for service of person making submission: as above		
Email [redacted]	Phone [redacted]	Fax n/a

PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION
⊘ I wish to speak at the hearing
✓ 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)* *ignature is not required if you make your submission by electronic means.*	
Signature : Karen Barker	Date: 6/3/2017
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 195ha dairy farm milking 530 cows, and we are situated in the Upper Waikato Catchment, sub-catchment 72.

We run our farm on a 2.8 cow per hectare stocking rate. Our Nitrogen leaching risk is 36kg/ha/year and our annual rainfall on average is 1200mm, the predominant soils being pumice. We import around 400T of mixed grain feed and 100T pasture silage. We have recently installed an entirely new effluent containment and reticulation system on our farm to ensure that we are future-proofed, at a cost of $120,000.00

In the future, we plan to continue to improve production and profitability on our property, so that we can invest in systems that ensure we are compliant with environmental standards, but we are concerned that the regulatory constraints suggested in this plan will make our business uneconomic and unviable for future generations.

We support a plan to improve the quality of the Waikato River and see that PC1 is a step in the right direction. We support the submission that has been lodged by Federated Farmers and we are particularly concerned about the following aspects of Plan Change 1:

- **The significant negative effects on rural communities**, beginning with the initial economic impact on farm finances, but leading on to others such as lower employment and social issues that may follow. Objective 2 states that "Social, economic and cultural well-being is maintained in the long term." (pg15) I do not think PC1 will enable this amongst the farming community. These communities are to bear the largest part of the financial burden for change due to this plan.

- **The potentially high cost of compliance** and the practicality of the rules (as mentioned above)

- **The effect that the Nitrogen Reference Point will have** on my business and the economic wellbeing of our family and the wider community. (as above)

- I think the Farm Environment plan requirements will lead to unnecessary and costly regulation of inputs, outputs, normal farming activity and provision of business information

- **Timeframes should be fair:** The timeframes for complying with the Nitrogen Reference Point rules are too short and potentially unachievable. PC1 states, "Based on the information currently available, the CSG has concluded that full achievement of the Vision and Strategy by 2096 is likely to be costly and difficult." I agree and question the timeframes suggested.

- The plan will potentially significantly exceed the 10 year targets in many attributes and areas – what then?
- The **lack of science** and also the use of science that is not fit for purpose. The supposition by PC1 on page 15 that "full achievement of water quality requires technologies or practices that are not yet available or economically feasible." There is a lot of supposition in this plan.

- **The lack of contribution to this plan for the health of our rivers by the Hydro dams and tourism operators** who both have huge impacts on sediment damage in the river.

- **Uneven distribution of responsibility for the health of the Waikato**. Municipal and industrial point source dischargers will have to revise their discharge, **but only** "when the current consent terms expire." This could be many years away, until which time they continue their poor practices!

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	Support or Oppose	Decision sought	Reasons
45	**Rule 3.11.5.7** Non-Complying Activity Rule – Land Use Change	**OPPOSE but amend**	Amend 3.11.5.7 as requested by Federated Farmers in their submission.	This proposal will impose significant costs and potentially prevent those wishing to move from one land use to another as was part of their business plan previous to this Plan. This will mean many family businesses will not be able to continue forward with their plans for expansion and limit the viability of their businesses.
47	**Schedule B:** Nitrogen Reference point	**OPPOSE but amend**	Amend Schedule B as requested by Federated Farmers in their submission.	➢ This proposal will impose significant costs on my farming activities including how much feed we can bring in, which will impact production levels, profitability and ultimately will reduce farm value and consequently our equity with banks. ➢ Reduced income, will mean less to fund other environmental mitigations. ➢ Our ability to reduce farm nitrogen losses any further is limited. ➢ It does not seem logical or fair that the NRP has been set over only two seasons between 2014 and 2016
51	**Schedule 1:** Requirements for Farm Environment Plans	**OPPOSE but amend**	Amend Schedule 1 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities including ➢ The cost preparation of an over-detailed FEP by an advisor plus any additional costs for mitigation. Fed Farmers study (Phil Journeaux, Nov 16) showed the average cost of FEP and actions was $40,000.00 ➢ Avoidance of cultivation on land over 15 degrees is unpractical ➢ Time involved with paperwork, filing and controls will be a cost to our business