

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	healthyivers@waikatoregion.govt.nz Please Note: Submissions received by 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/healthyivers
We need to receive your submission by 5pm, 8 March 2017.	

YOUR NAME AND CONTACT DETAILS		
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ADDRESS FOR SERVICE OF SUBMITTER		
Full name Alan Bryan Wills		
Address for service of person making submission 928 Forest Road RD2 Reporoa 3083		
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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. Yes
<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
<i>(or person authorised to sign on behalf of submitter)</i> <i>Signature is not required if you make your submission by electronic means.</i>			
Signature		Date 8/3/2017	
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

OUR PLACE

My wife Alison and I farm 2 properties on lower land in Reporoa. The bigger unit of 176 ha's carries 490 cows and the smaller unit of 108.6 ha's effective carries 300 cows. The farms have a common back boundary. Also in the mix is a 60 ha run off 4.5kms from the home farm on Strathmore Road Reporoa. This block winters 400 cows and is then harvested 3 times-(summer weather permitting). Some of the harvest, approximately 200 T Dry matter, is trucked back to the production blocks.

For nearly 20 years we have had an annual programme of fencing and planting the streams on the farms. The fencing was completed 6 years ago but the planting will go on for many of years yet. We commit \$k5 annually to riparian planting.

Our farming philosophy is to farm at a modest stocking rate and to use some supplement to ensure good levels of production.

Our annual N reference points range from the mid 30s to the late 40s. They vary each year.

We are environmentally conscious and fully understand what we need to do to play our part for improving for the water quality in the Waikato River. The 3 big items we need to address in the next couple of years are;

to take the drainage from the underpass to the effluent system

the installation of a lined storage pond

and to re contour the races so that run off from the races does not find its way into the small streams. We have 10 culverts on the farm. This process will also involve building retention dams or soak holes.

THE SCIENCE AND THE PLAN

PC1 offers a period of 10 years for farmers to implement Farm Environment Plans, establish a Nitrogen Reference point and to understand and implement what Good Farm Management Practice looks like. I support that aspect of the plan and as a farming leader actively encourage the farming community to get on with what needs to be done. However while the farming community is putting a focus on what they need to do the Regional Council needs to be reconsidering the science, connecting with new science and how and why the CSG arrived at the plan that they did.

Currently, in its present form I consider some aspects of the plan to be hostile to the V & S of prosperous communities;

- The fencing issue in the hill country areas is one
- There needs to be a review of the use of N to cover the 4 contaminants. I consider it to be a hugely blunt instrument when the other 3 contaminants, E.coli, sediment and phosphorus are so closely linked.
- The relationship of N & P needs to be reconsidered. The Waikato River is P limited and so if an emphasis can be put on P it would give more head room within the river for the V & S of prosperous communities. The water quality measure expected at the Tuakau Bridge is an example of that.
- The adequacy and performance of the small town sewerage and waste water processing needs to be part of a go forward plan as well. I comment regularly that the farming community is part of the problem and therefore must be part of the solution. However there are other parts to the problem and therefore others who need to be considering solutions as well.

- The fact that the CSG ran out of time to consider all of the science is a real concern and plainly unfair to the farming communities. We deserve a thorough and carefully considered review of the science. Not a rushed job and a plan that needed a casting vote to continue.

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OUR FUTURE

We have another generation, our 3rd, recently returned the farm. I am anxious that he has the opportunity to take the productive and environmental performance of the farm to another level. That we are not straight jacketed, grand parented or locked in to where we are now. That will be important to all rural communities going forward and will be essential to the V & S of a prosperous community.

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.

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.	

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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.	
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.	The days of huge areas of forestry land being converted to pasture need to be over as does that of large corporates getting involved in the conversion process. However there needs to be a recognition that for some families to retain their family farm a change in land use will need to happen.

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
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>The 2 years being used to establish this reference point coincided with either a difficult production year or a significant payout drop. These 2 years are not reasonably representative of where many farms were at.</p> <p>We don't need a fixed point but a range to work within would be a better system.</p> <p>I absolutely agree that the high emitters need to changing their systems or putting more mitigation in.</p>

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50	Schedule C: Stock Exclusion	OPPOSE	Amend Schedule C as requested by Federated Farmers in their submission.	We are fully fenced here but am very aware of the issue around hill country.
51	Schedule 1: Requirements for Farm Environment Plans	OPPOSE	Amend Schedule 1 as requested by Federated Farmers in their submission.	I support the concept of Farm Environment Plans.

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