

## 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.

Emailed 8/3/17 3.18pm Poskd before 4pm, Tuakan 8/3/17 (Anal pickup)

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

SubForm	PC12016	2016 COVER SE	
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SUBMISSIONS	SUBMISSIONS CAN BE				
Mailed to Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton					
Delivered to	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton				
Faxed to	axed to (07) 859 0998 <i>Please Note:</i> if you fax your submission, please post or deliver a copy also				
Emailed to	<u>healthyrivers@waikatoregion.govt.nz</u> <b>Please Note:</b> 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 DETAI	LS								
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# 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 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.

 $\sqrt{1}$  could not gain an advantage in trade competition through this submission.

SIGNATURE	0	E. monthered		SUBMITTER
(or person authorised to sign on a	behalf of submitter)			
gnature is not required if you mak	e your submission by electron	ic mean	<b>S</b> .	
Signature Ralary	(electronic submission)	Date	8/2/17	
Personal information is used	for the administration of	f the s	ubmission proces	s and will be made public. All
information collected will be	held by Waikato Regional	Counci	il, with submitters	having the right to access and
correct personal information.				

#### SUBMISSION POINTS: General comments

Firstly, before your read my 'attack' on the PC1, I would like to assure you that I approve of steps towards improving waterways & the opening of discussion & debate towards that goal. It is bringing in to the forefront projects that are on the 'one day', and/or 'when I can afford it' list. I want to do the right thing in co-operation with the council and the government & other bodies, but I also want to be able to do it while managing to make a living, retaining the value of the land I worked extremely hard & made many sacrifices to achieve ownership of and while managing to remain farming. In effect, I do not believe farmers should be footing the bill. I apologise for focusing on the negatives, in advance. I would have liked to spend more time on it.

Please note: I have been to several workshops and seminars and have spent many hours reading, making notes and attempting to understand all the jargon and policy writing methods. I was unable to attend the local workshop on how to write a submission. I have spent 3 full long days, I couldn't actually afford to spare, attempting to write this submission. Although I ran an award winning business once, I've found writing this report difficult & I would need at least 3 more full days to improve upon it. I no longer have 'any' staff to delegate work to while I focus on these such things & I am balancing several important roles including farmer (solo), parent (solo). I ran out of time to edit it shorter, to make it less emotive, more concise or to council standards. Livestock, hay, weeds, late end of year accounts, children, urgent unavoidable farm work, family festive events and school holidays have taken up all my time since the plan was released.

I trust that my lack of expertise in submission writing will not mean any of my points throughout this document are discounted. I found it difficult & ran out of time to include all my points Numbered 1-39 into the table & to maintain a formal like document as per the council's documents.

"You will never positively alter land owner's attitude towards environment restoration & working cooperatively with bureaucracy while you penalise them &/or threaten their livelihoods for having national features of significance (or gold) & general health generating habitats on their properties. Compensate them for protecting the waterways and loosing land. Reward them for ongoing caretaking of the health of the Nation and they will get on board. The whole nation would then be paying (within their taxes) for the restoration of decades of damage by the whole nation and the whole nation would benefit (rather than the minority being expected to pay for the damage by all, suffer hugely in the short term and continue to struggle looking after it all in the long term for the benefit of the majority who are the highest environmental pollutors & users of our resources). Further reward those who have gone or go the extra mile eg: organic & biodynamic farmers which would encourage more to do so (markets are demanding this also). This wouldn't only benefit the environment and human health but also create more jobs as they are more labour intensive systems. Encourage tourism and services to the community on farms by enabling and supporting business

### enterprise consents other than grass farming on farms & assist them to overcome the huge barrier of consents, strict controls on what they can do on their land, and the health and safety regulations".

I own a 230acre dry stock farm. I am a solo mother farming the property on my own. This precious place is mostly rolling to steep with approx 25acres of flat. It has approx 60-70acres of bush and wetland & 1.5kms of Waikato river frontage.

Prior to farming I owned and operated an award winning business for 17 years with my ex husband. We were Supreme winners of Franklin Enterprise Awards 2003 & Franklin & Papakura Enterprise Awards 2009.

In the last 10 years we/I have experimented with several avenues of income on the farm depending upon finances, market predictions & family circumstances. I leased it out in total for a couple of years, grown maize, raised dairy heifers, grazed beef cows, grazed dairy weaners and heifers, grazed a few horses, cut hay, leased an area to a sheep farmer, raised beef steers and heifers. In the last year I retained the full property as a whole (no leasing except for a lifestyle portion), have bought in mostly young heifers plus some steers of mixed age and breed. I have also kept a small mob of breeding heifer/cows since they were bought as empty but were in fact in calf. I therefore put them to a bull for a 2<sup>nd</sup> calving (mostly due to the incredibly high cost of buying in livestock that year).

When my ex husband and I purchased this property in 2006 it was bareland with very little fencing (except old decripid ones), no water reticulation at all. It was the rough portion subdivided off from a large crop farm. We built yards, a shed, some key fences, troughs in a few key paddocks by the yards, solar power (cost of approx \$470,000). We paid a premium for the land due to its prospects for our business we then owned. Full cost after initial improvements approx \$1,670,000. Some of the fences were erected one side of waterways. We planned to undertake full environmental restoration of the property over time and farm the remainder organicially however our marital separation meant this became impractical & financially impossible for me. Upon seperation in 2011 the property was only valued at \$960,000. Marital property settlement in 2014 was not financially fair to me however I did achieve becoming mortgage free on this farm. This is the only reason I can afford to remain on this farm as it is not viable as a stand alone block.

I have become a full time student this year so I planned to lease the farm of which both of my sheep and beef farmer neighbours are keen. However they would wish to increase the SU & inputs for profitability – under this new PC1 I am concerned they would not be able to.

I have looked in to subdivision (costing approx \$6,000 in expert reports!!!) via bush covenants but the council rules are unfriendly so the initial and long term costs far outweigh the benefits. One idea of subdivision was to create a few large lifestyles of approx 50 acres each, the other idea was to subdivide several smaller blocks off, the profit from which would mean I could achieve all the farm development of bush covenants; fencing, water reticulation, planting, weed & pest control as well as build a house (I live in a small portion of consented accommodation within the farm shed). However there were too many restrictions to do anything worthwhile via bush covenants, the worst of which is being allowed only two extra titles. Plus the bank refused to loan me the money for any development due to my income being too low.

Ideally, in the future I would like to develop an adventure tourism business to operate alongside a small organic mixed farming enterprises on the farm (bees, flax, beef, sheep, milking goats, pigs, chickens etc) – perhaps creating a cluster of small enterprises ie: small enterprises with organic expertise (a rural organic mall so to speak). All to complement my dream of bringing Natural burials on Private Land to NZ:

To restore the bush and wetland sustainably and financially viably I would like to create a farm funeral business (on farm Natural burials)-the organic produce from the farm will be used within that enterprise for catering. The business course I am doing this year is hands on; creating a business plan for a concept the student has. I am using this time to explore the concept of pioneering Natural farm burials in NZ. This is common in

the UK and US but has not been done in NZ (except in a few council cemeteries). This concept embodies all that is good & the sort of thing that is needed for rural land owners right now ie: provides monetary compensation to land owners for retired land, restores natural habitats, provides an alternative and environmentally friendly burial/funeral option to people, provides family and friends with special, beautiful & healthy spaces for grieving, remembering and simply 'being', provides the public with future public areas of beauty and significance (once the plot is full it becomes public land managed by councils), frees up land for councils to provide cemeteries & parks for the public, reduces the planning pressure for public land for cemeteries & parks, provides more options in cemetery & park locations (particularly for rural people), provides RURAL sites of beauty rather than only urban options, eliminates the heavy burden on landowners to maintain non profitable retired areas forever more. My biggest concern is bureaucracy and the cost of bureaucracy (district council, regional council, river body, iwi, archaeology, ecology, geology, engineer, planner etc) & health & safety regulations with still a risk of prosecution. In order to afford any land use change or development, grants, subsidies, freeing up on subdivision is required. I would personally prefer the grants & subsidies option so as to not have to lose any of the small amount of prime land I have.

I am concerned about the following issues with PC1

- 1. The impracticality of fencing every waterway, wet area, spring, waterhole on my small 230acre farm which is extremely water rich & has had no draining of water done to it.
- 2. The loss of land in order to break even
- 3. The amount of fences that would criss cross my farm creating extremely small spaces, difficult stock movements & force heavy stock to walk up & down areas they would not otherwise creating an erosion risk.
- 4. The maintenance increase of multitudes of single wire fences due to flood, stock and weed damage
- 5. The explosion of noxious weeds which occurs when areas are not grazed, in particular (on property) yellow flag iris, blackberry, alligator weed, wandering jew, morning glory, woolly nightshade, gorse & of course Kaikuyu.
- 6. Reduction of flexibility to change farming practices to meet the weather conditions, market demand, new education or innovation, financial pressures.
- 7. How to fund water reticulation and fencing of waterways for 230 acres as well as replace faulty boundary fences and repair existing fences currently needing funds already.
- 8. The very definite loss on the value of my land if I can't achieve the regulations
- 9. Criminal charges when/if unable to achieve.
- 10. Maintenance of so much retired land
- 11. Making a living from a piece of land which is to become less viable than it already is.
- 12. The apparent penalisation of extensive farming;
  - a. It seems those who have not drained waterways and wet areas (or cleared trees) are to be penalised while those who have intensified their farms for profit by clearing & draining natural habitats are to be rewarded.
  - b. It seems those who have farmed with low inputs and extensively (lower SUs) are to be penalised (restricted in their ulitlisation of their land in the future via the Nitrogen reference point) while those who are over utilising and poisoining the earth are effectively to be supported in their practices.
  - c. Those that have made voluntary environmental improvements are not being acknowledge or rewarded.
- 13. How to pay for Certified Farm Advisors to provide nitrogen reference point (NRP) & Land Environment Plan (LEP). Apparently anywhere between \$4,000-\$10,000 for my size property.

- 14. How to find the extra time for producing a LEP plan
- 15. How to find the extra time for implementing the LEP plan and then maintenance of implemented elements
- 16. Apparent discrimination towards farmers; It appears a small majority of the population are being blamed for and made to pay for the decades of damage by ALL New Zealanders. Public opinion of farming is being led astray so that farmers are effectively becoming the enemy of the general public in both environmental issues as well as animal welfare. The message from this PC1 is that farmers are to blame further defaming farming in the eyes of the general public (uneducated in the facts & not owning any of their polluting).
- 17. Further increase of the already high farmer suicide rate due to stress. Dry stock farming (I can't speak for other sorts of farming), has low returns and is stressful. I owned a commercial manufacturing and wholesale business prior to farming so I know what business uncertainty is like however I have found farming more uncertain as there are many more variables outside of your control and it changes daily rather than, say, quarterly. 5 years into this very big learning curve I have an even greater respect for the farming entrepreneur than before. And a better understanding of why they talk about the WEATHER ALL THE TIME!
- 18. Farmers will ultimately become unpaid 'retired land' caretakers. I can see myself spending a substantial amount of my time as a groundsperson on retired land for the good of the majority of NZers, while those NZers earn a good income at their jobs while I do it.
- 19. Farmers will allow their waterholes and even some dams to breakdown so as to once again dry out over the summer and not require fencing & ongoing fence & weed maintenance. They will not create new ones.
- 20. This will Increase income for consultancy & public service sectors while reducing income for farmers and those supplying goods and services to farmers & ultimately
- 21. An influx of intellectuals telling farmers what they have to do to comply.
- 22. Damage to NZs economy as a whole since primary production is still up there with tourism as a main earner.
- 23. Chemical damage & over use of inputs & irrigation appears to be being ignored in this PC1 & those with high use of these are being supported.
- 24. More serious NZ contaminants such as urban runoff, sewerage & waste water, plastics & chemical, use are being ignored
- 25. The fact that we utilise toxic non biodegradable products in massive quantities every day is being ignored. How many dumps are we going to fill before this changes? How many more Hampton Downs are we going to need-out of sight, out of mind but those liners won't last forever...... http://www.stuff.co.nz/waikato-times/news/5782734/Renas-Waikato-dumping-ground
- 26. My past research shows that the river quality decreases at and after each town rather than through farmland. So why are rural landowners still being targeted rather than the towns and cities? Why is treated sewerage still being discharged into the river!? And why are big industries still allowed to discharge waste -into t-he river? <a href="https://www.waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rivers/waikatoregion.govt.nz/environment/natural-resources/water/rive
- 27. Have old & current leaky dump sites on the riverbanks & inland dumps, poisoning the groundwater on their way to the river being addressed? Approximately 8-10 years ago I was studying river quality and noticed a sudden decline at a certain point of the river. Upon further research in to why that is I discovered that there was a problem with the Horotiu dump. Today I searched again and see it has been closed (does that fix the problem?!)
- 28. Health and safety regulations & consents; in order to reduce farming ie: service business on the farm I am at further risk with Health and safety & council due to more people on the farm. Work WITH landowners eg-tourism consents, title allocations to fund alternate enterprises and stock exclusion, get a hold on the crazy extent of OSH and achieving rational health & safety regulations, reducing the vulnerability of intense businesss and the health of business people and their families due to the destroying intimidation by police and OSH upon every accident. This makes me nervous to open my land to the public. We cannot stop every accident and business' & people should not be destroyed while they are being proven innocent or guilty. Summary: to change my farm to more people oriented business from a solely livestock oriented business I first must invest

masses of \$ in consents and experts & outline every hole in the ground knowing that no matter how well I do it OSH will find a hole I omitted putting on the map so I ultimately risk cessation of business/income, prosecution, years of stress resulting in liquidation or unachievable debt for life or imprisonment. And thats even if I manage to afford the fees and stipulations for approval for a consent. NZ is reknowned for small business historically but due to increases in costs and regulations I suspect this trend will be on the steep decline (start up and survival).

- 29. Increased health & safety risk in regards to single electric wires criss crossing paddocks to waterholes, springs and wet areas.
- 30. Small land holdings become even less viable (dangerously so). If subdivision not opened up they would lose massive value & become unsaleable (certainly for enough to pay off the mortgage). Massive impacts on rural families and communities. And do we want them all subdivided? Urban housing needs to go UP not out in my opinion
- 31. Very short submission timeline: Feels coercive & autocratic to me; steam rolling the minority population of farmers.
- 32. Cost of full farm water reticulation (approx \$10,000) and ongoing maintenance of. Increased risk of stock being without water due to reticulation breakdowns. Stock on a low intensive farm should be able to be left for long periods without water concerns (or it becomes too labour intensive and therefore non viable).
- 33. Cost of retracking much of the farm as most tracks follow waterways and ditches as they are the natural low & flatter points
- 34. Impracticality of moving many of the tracks away from the waterways due to steep inclines off those areas would be costly and cause erosion.
- 35. Loss of productive land. Losing even 10% of land on a small farm has a huge impact upon income. And where it already cannot afford to pay a wage, that loss is devastating to the family unit.
- 36. Too many rules, restrictions on our land that rule out other means of generating income eg: I can't even rent out an unused duck shooters cabin long term because it then becomes a dwelling (a controlled activity); I can't afford to consent it as a dwelling I don't have the time, energy or personality type to manage it as per a permitted short term farm stay accom (I would have to induct each one to the property (OSH), administer, market it etc & I'd have to feed them, share our home bathroom & kitchen with them)
- 37. Drystock farming will have to become intensive, as dairying has, in order to survive.
- 38. Politics-this exclusive focus on farmers appears to me to be a political move ie: the majority of voters are urban therefore make the environmental moves demanded by the nation solely focused on hurting only the minority; rural dwellers. The government is 'Seen' by the urban dwellers/voters to be doing something substantial when in fact it would seem to me (would love to see the science) that there is more toxic runoff from towns and cities than from the country (particularly dry stock country)! And additionally why is the government not focusing on the worse pollutants; Fuel/oil, plastics & chemicals & ALL those who produce & then those who use them (the whole population). These are a much bigger problems to our waterways & oceans than dry stock farmers. I suspect the reason those pollutants are not being focused on is because they involve too many voters & too many Companies with big \$ to fight. So the lower income, minority; beef & lamb population are picked on in order to get it through quickly and easily (I say beef and lamb because this PC1 negatively effects them (low impacters) more than anyone else and certainly does not appear to effect the intensively farmed land in any constructive manner).
- 39. We are already paying an extra rate for river maintenance!

#### SUBMISSION POINTS: Specific comments

Page	Reference	Support or	Decision sought	Give Reasons
No	(e.g. Policy, or Rule number)	Oppose	Say what changes to Plan Change 1 you would like	
11	Rule 3.11.1	SUPPORT with amendments	Please involve all NZers rather than farmers only & consider all contaminants rather than a few. Supply the science showing the worst contaminants	I support the overall objectives and reasons of the PC1 but I do not agree with the narrow focus or of the total cost of waterways restoration being worn by those within that narrow focus
15		SUPPORT with amendment	Add provisions to Pakeha also to: Provision has been made for some flexibility of land use for Maori land that has not been able to develop due to historic and legal impedimens	Maori values are outlined in relation to the river however Maori have been given more leniency in relation to undeveloped land. I agree this should be the case however I feel Pakeha should also be given the same provision in relation to personal circumstances eg: my marital breakdown which took 2.5 years to resolve & the consequent lack of funds to farm conventionally in the short term.
22		SUPPORT with Amendments	I do not feel this PC1 is meeting this value: "The rivers are a shared responsibility, needing collective stewardship: Kaitiakitanga"	<ul> <li>I agree with this statement and therefore OPPOSE the ongoing focus on farmers/rural folk. Urban dwellers want an improvement as much as rural folk therefore Urban dwellers need to be focused on also – Nzers are shocking with their total disregard to the environment (ask visiting environmentally aware German tourists).</li> <li>Urban sewerage, waste water and runoff due to lack of soakage &amp; other mitigating factors</li> <li>everyone's over-use of plastic</li> <li>Dump sites &amp; the requirement for more and more!</li> <li>Household, farming and commercial chemicals</li> <li>Fuel &amp; oil.</li> <li>Runoff from roads and built up areas!</li> </ul>

Page No	<b>Reference</b> (e.g. Policy, or Rule number)	Support or Oppose	Decision sought Say what changes to Plan Change 1 you would like	Give Reasons
				Try outlawing plastic packaging & chemical cleaners & creating catchments for toxic road runoff which runs directly into our waterways! What about focusing on the multitudes of business' supplying the pollutants including plastics, chemicals, oil & fuel (too many voters? Plus they have more money & administrative staff to fight it.) I may be farming animals (for the good of NZ econony and NZers) but I compost, recycle (even though I don't receive pickup), dispose of only one rubbish sack per month of plastics (its hard to do less that that unfortunately due to the intensity of non biodegradable packaging everywhere), use no household chemicals (use vinegar, baking soda, environmentally friendly (less effective) dish wash detergent and clothes washing powder, elbow grease), avoid sprays on my house grounds & farm (except for noxious weeds), avoid fertiliser (stock lightly instead). Its likely I pollute a lot less on my 230acres than the average urban dweller in their 3 bedroom house with a small garden. I see no economic or social rationale to exclude urban dwellers and pollutant providing & using business' from the healthy rivers scheme. The only rationale I can perceive is political (refer my statement No. 39 on page 5). To increase rates to these sectors in order to achieve restored waterways will lose votes (even though these voters have requested a focus on restoring waterways). I understand that telling them that "everyone will suffer in the long term from making the primary production industry suffer further in order to pay further to save the waterways. Everyone needs to contribute financially and change their lifestyles and/or way of operating their business' to fix this NATIONAL problem. A 'national' focus, one step at a time eg: reduce plastic and chemical use as it effects everyone fairly &, I imagine is a significant environmental

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27	Objectives 2&4		All people's pay & act towards the restoration of our waterways rather than famers only	contaminant, not only due to waste but in its production also. The whole of NZ will suffer if primary production continues to be totally focused on as the cause of NZs environmental problems. Not only due to increasingly reducing profitability & stress for farmers; NZers and International perception is being inaccurately & negatively altered towards our primary producers. This is bad for our world trade, tourism and the economy as a whole. The focus needs to be national; it is a
				national problem with pollutants from all industries & all peoples. Are Aucklanders going to try and blame farmers for their unswimable, polluted streams, beaches & harbours. Based upon the expectations on farmers all cities dwellers should be paying for individual waste, sewer, runoff & water management systems at least. Urban dwellers (including Aucklanders) are using the Waikato river & resources for all manner of things including food, drinking water,
				recreation and power. Shouldn't they be assisting to restore and maintain the resources they use and pollute?
39	Rule 3.11.5.1 Permitted Activity Rule – Small and low intensity farming activities	OPPOSE with amendments	Only Stock exclusion from main water bodies such as rivers and lakes should be insisted upon with very low SU properties.	The stocking pressure of under 6SU is VERY low per acre which means profitability is sacrificed for the good of the environment. This rate of stocking would not be detrimental to waterways. The cost of stock exclusion and maintenance of retired land would no doubt be impossible under such a low return. It would force the positive low intensity farm to become a high intensity farm.
			Setbacks should be no larger than in non permitted activities	Why should a permitted, low intensity farm have to have bigger setbacks

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			(seems it 3m instead of 1)	than high intensity farms???
			Increase SU per ha	To encourage good environmental practice farming, it needs to be more viable than 6SU/ha
			Allow these blocks to be leased out if stock units remain under the set amount average over the year and remain lower than the set SU during the higher nutrient loss risk times of the year	Small dry stock land holdings (and lifestyle blocks) are generally unviable on their own so it is common practice to lease them out while the landowner/s work off farm to make a living. If these landowners are insisting upon low SU then they care more for the environment than the higher lease income per acre they could achieve from higher SU. This should be allowed, enabled and encouraged. Low SU means low inputs & low pressure on the land enabling rejuvenation, soakage, filtration, ecological health etc. Increasing the capital outlay and ongoing increased maintenance required on the farm via total stock exclusion means they cannot viably maintain low SUs.
40	Rule 3.11.5.2 Permitted Activity Rule – Other farming activities	OPPOSE as stated	Not enough information supplied on how and at what cost to increase income from a farm currently & in recent history farmed lightly (then to be allowed to submit upon this)	I'd like to know how a property now. (and during the measurement years @ March 2015 or 2016), being farmed inexpertly or intentionally lightly with under 6 SU/hectare can convert to being farmed conventionally in the future. I am very concerned it will be difficult and costly which reduces the value of the land to potential buyers and reduces the likelihood of increasing the income from the land if it became necessary at a later date.
			The ability to increase SU to at least the avg SU for the area, and upon implementing all regulatory measures, to increase to the maximum	My farm has been understocked for approx 8 years due to it initially being a sideline to our main manufacturing business (while strategically planning to move that business to this property over time), then a marriage breakdown & subsequent 2.5 years of conflict to settle all assets & then consequent amateur farming by myself on my own while parenting two children. Virtually no inputs in all that time & very little capital outlay or maintenance.

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			Take out (3.c)	Simply put: my farm has not been 'farmed' for many years due to personal & business circumstances. How can I now lease it out to a farmer for them to make a wage off it if it is measured on past performance or even 75 <sup>th</sup> percentile?
				Costs continue to mount! Compliance proof should be able to be provided by the farmer themselves verified by their accountant or bank manager. If the council have reason to believe the compliance proof is faulty, the council can pay the costs to verify it. Then if it is found to be an intentional and/or significant misinforming penalties may apply including paying the council costs.
				Council appear to be offsetting, to land owners, the cost of policing their policies and regulations. A Company can not charge it's employees/stakeholders to police it's policies and regulations enforced upon them and neither should the Council or government. Administration costs should be a National/regional cost.
			(3.e & 4.e.ii) consistent measurements need to be quoted. Here it states 3m whereas on page 51 it states 1m or 3m depending upon the contour & where practicable.	Why should a permitted, low intensity farm have to have bigger setbacks than high intensity farms???
			(4.c) Am I reading this right?! No grazing over 15 degrees!?	If the average dry stock farm is farming 9.8SU then be encouraging to farmers to improve without causing undue hardship on their business' &
			Please make this reasonably achievable	families for example: SU at or below the current low end of SU (or the avg), low to no artificial inputs & nutrient, stock exclusion to 70-90% of waterways=permittable activity. Those who do better receive a subsidy/reward as they are adding to the health of the country.
				The plan appears to be intentionally excluding 'real' financially viable

1	1.	Rita	Carey
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				farming practices as a permitted activity without the cost & restrictions of a LEP & NFP & Certified industry scheme system & the ongoing audit of such. Even those doing a good job environmentally already or those who could alter their practices to be permitted within the time frame can not receive a wage within the 'permitted' parameters. Profit is required to be sustainable and to develop the farm further. The plan is effectively forcing farmers to incur more \$ outlay, administer more (most people who choose a farming career are more practically based) & be controlled by a fixed plan & office/intellectually based experts and public servants. I was selling products to drystock farmers for some years – this is not the sort of people or the sort of business environment that could handle micro managing and lack of flexibility in the market place. The costs incurred and the types of administrative skills required are going to incur costs that price NZ ag products out of the world market. And are going to require the type of administrative minds that are only present on a small proportion of farms (generally wives whose labour is nowhere near covered by farm revenue & who are already run off their feet). Small business' Nationwide are being destroyed by this same level of administrative requirements. Micro managing destroys creativity, innovation (the famous kiwi number 8 wire survivability), flexibility, motivation, contentedness, autonomy, self management, initiative & reduces production, profit, and the means to change track in order to survive when things don't go to plan. I see this PC1, (without govt administrative & financial assistance) damaging rural NZ lifestyle similar to complying fully with health & safety regulations is doing (dry stock farming in particular – dairy farming has already lost much of what it was a generation ago & has had to become INTENSIVE to survive).

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41	Rule 3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	OPPOSE	Needs funding	<ul> <li>This proposal will impose significant costs on my farming activities including <ul> <li>Experts to create LEP &amp; NRP &amp; appropriate Certified industry scheme system</li> <li>Nutrient budget?!? (totally new concept for a low SU unprofitable farm/lifestyle)</li> <li>Administration of &amp; data collection for LEP, nitrogen reference point &amp; the Certified industry scheme system</li> <li>Water reticulation &amp; maintenance</li> <li>Fencing implementation and maintenance</li> <li>Increased Weed control</li> <li>Stock crossings (I imagine to an expensive standard)</li> <li>Livestock losses as need to reduce cattle due to impracticality of fencing them off some waterways</li> <li>Increased labour for less profit (replacing cattle with sheep)</li> <li>Shearing shed and equipment (or income loss as will need to lease it to a sheep farmer instead)</li> <li>Shearing shed and equipment (or income loss as will need to lease it to a sheep farmer instead)</li> <li>Problems with electric fence shorts due to retired areas' encroachment</li> <li>Maintenance of retired land (fences, weeds, pests)</li> <li>Labour for all of the above (time which would have been ulitised making money)</li> <li>Loss of production (retired land)</li> </ul> </li> <li>The dates are too quick for the industry and farmers to adjust, learn, develop and implement along with achieving funding via govt grants/subsidies/titles (yet to be offered), or banks or years of saving.</li> </ul>

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			Develop & Add an Incentives & rewards scheme for having done or doing the right thing (eg: retiring land=land titles. Fully funded grants for environmental improvements which also help with general farm improvements eg: water reticulation. Ease costs of maintenance via Subsidies (like in the UK) for caring for NZ treasures-bush, waterways, archaeological sites and discounts on such things as rates, ACC. Grants fully funding consultancy eg: LEP, NRP, health & safety	<ol> <li>Compensate for land/profit losses &amp; extra time/cost in maintenance.</li> <li>People are drawn to profit so if it becomes more profitable to create environmental practices people will start moving that way. And if there is financial &amp; advisory assitance to get there then the fear of change &amp; the unknown is reduced.</li> <li>Watch the farmer's attitudes change naturally to become positive and co-operative in response to an incentives and rewards based scheme which foster's both the survival of their livelihood, land values and lifestyles along with environmental health, rather than turning the rural community further against the council &amp; Government by enforcing blanket rules, costs and penalties that threaten our agriculatural communities. All of a sudden the counsultants you want them to hire become their allies, in achieving benefits to their rural business' as well as to the environment and NZers as a whole, rather than costly enemies they do not want on their farms.</li> </ol>
			Add reward for those farmers already doing a good job voluntarily- they also shouldnt have to pay for a LEP or be restricted by nitrogen Add reward to those who have voluntarily retained the natural features such as waterways & trees rather than got rid of them for higher grass production & easier maintenance (now to	

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			their detriment). Add incentives by outlining further rewards/compensations by going the extra mile eg: certifying organic or biodynamic or creating environmentally friendly alternative to pasture grazing businesses on farms eg; adventure tourism Where the implemented grants, subsidies, titles do not fully cover the necessary funds, offer 0% interest loans to undergo compliance work with small amounts of capital being paid back by the farmer monthly eg: 5% of turnover if their accounts show this is manageable	We need the work funded. Having attended workshops last year and becoming worried about the impeding implications of both the Healthy Rivers PC1 and the Significant Natural Areas undertaking, I began researching subdividing my property in order to acquire funds to do the work (building a house would be nice too since I live in a small consented residential area of my farm shed). It cost me \$3,000 to achieve an 'initial' ecologists report confirming that the bush & wetlands on my farm, I already knew to be beneficial ecological sites, were in fact beneficial ecological sites. The ecologist advised the spend on fencing, weed control, pest control, planting would be substantial and I would need to retire 13ha continuous in order to achieve 2 titles. I have two areas this size but I am only allowed 2titles total. I spent a further \$3,000 on planning & geologist advice. My planner advised that the council rulings were not friendly enough to justify firstly the cost of doing bush covenants and then secondly maintaining them forever more. The geologist advised I only had a few spots good enough to subdivide off (my best road frontage flat land of course). After months of research and \$6,000 it was decided that it would be far wiser for me to buy two transferable titles (a system soon to be scrapped I understand) than to protect the significant natural features – very sad!

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				I went to the bank: My bank has declined my loan application to purchase two transferable titles and subdivide off two titles in order to fund farm development because my income is too low. My income is also too low to borrow the amount required for one title. I have asked many of those hosting the various healthy rivers workshops over the past year or two re: what financial help or incentives such as extra titles and grants will be provided in order to achieve the objective; all lve heard is that there is a lack of funds available to council to even 'administer' the scheme!! I have researched grants several times over the past 7 years to do environmental work and again and again I'ver been told I'm outside the focus area. If I was in the focus area the most help I could expect is 30% Looks to me as though we are all in the focus area now!?
			Encourage & enable positive land use change via free advice, consent cost relief, consent leniency (assist them to achieve consents rather than blocking them), health & safety compliance free assistance. Working with iwi & archaeologists etc	<ul> <li>Increase clean green tourism &amp; other types of rural business'</li> <li>-reduce SU/ha while remaining profitable</li> <li>-increase rural diversification</li> <li>-reduce farmers' reliance upon dairy, meat &amp; wool markets</li> <li>-inspire creativity</li> <li>-utilise government's business grant schemes</li> </ul>
			Perhaps; any idea that fosters the environment eg-a change to organic or biodynamic methods (very costly & a big learning curve), adventure tourism (OSH!!), natural burials etc be subsidised by the govt eg- advice & fee free eg-like a business grant	

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			Ease up on restrictions on farmers in what they aren't allowed to do on their farms	There are currently too many rules, restrictions on our land that rule out other means of generating income eg: I can't even rent out an unused old duck shooters cabin because it would then be classed as a dwelling; I can't afford to consent it as a dwelling plus it would be unwise to utililise my dwelling rations on a little cabin. I don't have the time, energy or personality type to manage it as per a permitted farm stay accom (my daughters and I would have to feed them, share our home bathroom & kitchen with them)
			Councils 'purchase' riparian land off farmers	I purchased riperian river rights as per my title. I should therefore be given the option of being compensated for the land the council is now demanding I retire @ market rates. The fencing cost maintenance of it including rebuilding each time floods take it out should be a council cost. The maintenance of weeds on the council side of the fence would also be a council cost.
			Submission process needs to be longer, better informed and more answers to farmer questions made available	Timelines too short for learning and submitting on the plan & there has been a decided lack of promotion. When I happened to see something one day I then had to search periodically due to lack of coverage & media coverage to find out what was happening. I missed several events I would have attended had I known. I didn't see any TV coverage. I don't get newspaper deliveries and I eventually found that the emails were going to a 'promotion' folder I don't have time to look at. No farmers or lifestylers Ive talked to know about it. The council told me they were all sent a flier in the mail; how much mail is read these days with the overload of information? Particularly when you are a busy farmer who does not spend much time in an office. It needs to be community based promotion & TV.
				Not enough time for public awareness or submission training and

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				assistance: Ive had 20 years commercial business experience and I find wading through all the reading & jargon over whelming, at the same time as running my farming business and parenting my children. So how are the majority of farmers who are more hands on people and lifestylers who are generally off farm double income families doing?
			Allow time for our experts to advise us	-We haven't seen the submissions from the organisations we pay levies or memberships to eg: Beel & Lamb & Federated Famers. Their advice is important. Although they have qualified staff familiar with council policy and making submissions & whose job it is to keep up with these types of things, not even they have had the time to complete their submissions within the time frame.
			Undertake multiple Farmer (& supplier support organisations) Question sessions with people qualified to answer (most question have a "we don't know" answer at this stage) so council may expand upon the plan based upon those questions & particularly the currently unanswerable questions. And the conflicting information we have been receiving eg: one item I read said constructed waterways don't need fencing but another said they did. Re-open submissions after	Much more information was required before final submission process. Many unanswered questions at the workshops Ive been to. Farmers are left unable to submit well due to not knowing the details eg (but not limited to): - The FEP has a wide range of discretion meaning that actions can be incorporated as a requirement of consent that go beyond those things that are currently specified. So we could be required to have setbacks which are greater than 1 – 3m, as part of identification and management of critical source areas. One example is that a Hill country property may have to fence off an entire gully or face when putting in a fence. (we don't actually know WHAT we are submitting on ie-potential costs or impacts upon our individual piece of land!!) Ive heard the rules can change at will ie: whereby I think the regulation says I need to fence 1m back, a 10m exclusion could be imposed at will!?!? How do I submit on something that appears to have not

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			more work is done on the Plan Change.	<ul> <li>standards?</li> <li>-what happens to my farm access which is via a paper road, through my neighbour's place, along the Waikato river bank? And who will fence it and maintain the river bank between it and the river once it's no longer grazed?</li> <li>-how are we going to be expected to deal with tracks along waterways with steep incline off the other side of them?</li> <li>-what will be the costs in future, such as auditing, after the initial costs of LEP &amp; NPR (also an unknown cost factor)?</li> </ul>
			Address the 'notes' in the CSG survey	-what happens with leased land? I suspect those who attended the CSG workshops were those who are pro river & whose properties would not be greatly effected. I personally believe I supported must of the suggestions in the survey as I am also pro waterways improvements but my notes said such things as "if it's funded". There was not enough information to give informed or wise feedback.
44	Rule 3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	SUPPORT with amendments	Create incentive to reduce chemicals, nitrogen, phosphorous, sediment. Incentives for organic & biodynamic methods & reduced percentage of land cropped and	This PC1 is supporting intensive activities, with no requirement or incentive for improvement. Much of the cropping I see in this area (Franklin) is very damaging & intrusive on our communities (I specifically do not like cropping being close to the schools due to the constant spraying of some additive or other. PC1 appears to allow the same intensity eg: cropping every sq mm they possibly can, anywhere they

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			any given time.	can. The fertilisers & sprays are being constantly applied & pour off their fields in foaming sentiment dense torrents, turning the streams & rivers orange, brown and foamy. I do not feel safe entering the streams and river here because of the intensive conventional cropping. And I am very unhappy about my friends & family living, working and schooling near the fields.
				Current regulations for cropping do not appear to be being enforced eg: good silt traps & ensuring over irrigation and rain runoff is directed to catchments.
			Increase the area to be left uncropped on boundaries	Allowing more room for machinery (boundary fences get damaged). Allowing more room to shape and move runoff to silt traps and settlement ponds. Providing more soakage for runoff, sediment, phosphorous, nitrogen etc. Creating more buffer between intensive inputs and the neighbours. Allowing a buffer between the weeds that seem to come from the fringes of their crops on to the neighbours. Reduce some of the overspray onto the boundary fences which appears to make the wire rust very quickly. Restrict where cropping is allowed eg: away from exisiting houses & public areas.
			Increase the water way setbacks	5metres is not near enough to handle the torrents of runoff (along with intensive additives) from cropped land when irrigating or raining.
			Address the intensive use of chemicals, fertilisers and other unnatural and intensive additives from all peoples.	Provide the data & science related to why Chemicals & other unnatural addidtives are not being taken into account in restoring healthy rivers! I believe it is the intensive farming, urban runoff, council weed and pest

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			Test the waterways for residues of the above and bring those way back.	control & business' discharges doing the damage so why are the extensively farming farmers being targeted?
45	Rule 3.11.5.7 Non- Complying Activity Rule – Land Use Change	OPPOSE with amendments	As per earlier notes & items within Numbers 1-39 Allow low intensity changes eg: cultivating a small area of the farm as a feed crop, trial crop, small volumn supply of a crop that comes into demand and looks to be profitable - to spread risk (mixed farming) Define how we avoid woody vegetation when spraying or clearing gorse, privet, woolly nightshade, barberry etc, particularly when aerial spraying	I need to get on top of noxious weeds & keep them at bay.
46	Schedule A: Registration with Waikato Regional Council		Include urban properties Allow a longer timeframe (for the reasons outlined previously)	What is the rational for excluding urban properties over 2ha?

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47	Schedule B: Nitrogen Reference point	OPPOSE until further supportive material supplied	Show evidence that nitrogen is the biggest problem in my catchment before enforcing NRP on to me Instate Chemical residue testing (but only if the council agrees to maintain our enforced retired areas by hand themselves) Identify a healthy nitrogen point avg for an area/type of farm. Higher users assess how they can reduce and lower uses are rewarded by some sort of subsidy (higher users will be rewarded once they get down there (incentives) Reward those operating at low levels currently. Create incentives to encourage others to do so.	My size of & low intensity type farm business & my lack of experience means I have no idea about the terminology related to nitrogen point or Nutrient budget. Data collecting?? Totally new to me! I understand in my area of the river the main problems are high phosphorous levels (cropping?), sediment (cropping?), carp, noxious weeds (being liberally sprayed by DOC, council with what, I do not believe, are benign chemicals), general human pollution, old dump sites, big business discharge, town sewer and storm water discharge, town and road runoff, people using the river banks and country roads as dump sites due to laziness & avoidance of dump fees (to name a few) so why is Nitrogen being blanket targeted? What is likely to be achieved here? I have no idea what my nitrogen point is & am concerned how much it will cost me to acquire that information and what impact it would have on my property & future earnings. I farm Extensively which means less income but less inputs too. To fence everything means the leftover land will need to be farmed intensively for still less profit & will need a lot of inputs to achieve the same stocking rate BUT you then hold me to the same nitrogen as farming extensively!?!? How do I survive?

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			Explain how we are expected to access the data from past leases Allow general age of animals	Keeping track of ages of dry stock animals is difficult. I buy them in as approx yearlings and sell them between age 2-3 unless not finishing them. Therefore stock are 'approximately' R1, R2, or R3.
50	Schedule C: Stock Exclusion	SUPPORT with amendments	Enforced retired land should be compensated for and maintained by council (effectively all NZers via taxation) instead of the land owner forever more (cost prohibitive for landowners). Or the landowner is paid to caretake it for the Nation (subsidy)	I purchased the farm with natural water, as a benefit, to all paddocks. I also purchased it with the understanding I could graze the entire 230acres as was done historically. Council should be compensating me for the significant loss of land/grazing/earnings (suggest \$ or titles with right to subdivide), the costs for water reticulation & fencing of the multitude of waterways (and the consequent loss of value of the land due to a already difficult piece to afford becoming even less viable). The council should also be paying for the weed & pest control & fence maintenance of areas demanded to be retired (or compensate the farmer via subsidy to maintain it forever more)
			All works enforced by council is a tax deductible expense at the onset & maintenance thereof	NOTE: apparently maintainance of bush covenants is not even a tax deductible expense currently???
			Stock exclusion-suggest an avg of be amount decided upon so that where it can be the fence is further back to account for it being closer where it cant be wider due to existing tracks, steep banks etc. Suggest that wetlands be fenced with no	I agree with needing to induce further exclusion country wide. I do not agree that all farms should be treated the same. Perhaps a starting point of all lakes and rivers fenced and 70% of other water within 10 years. But also bearing in mind how much water per acre of land? = a measure of cost to that farmer & what is practicable for each individual farm eg: crazy to intensively fence & water reticulate hill country. Crazy to zigzag a small farm water rich farm with multitudes of single electric wires.

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			setback as there is no advantage	
			Consider waterholes & dams as beneficial for the environment as well as water storage & allow farmers to create & use them for all both reasons.	If farmers are enforced to fence off & maintain these features as retired land then it stands to reason that Farmers will no longer maintain them and will allow their waterholes and even some dams to breakdown so as to once again dry out over the summer and not require to be fenced or incur the ongoing fence & weed maintenance. They will also not create new ones.
				These waterholes are generally hard to fence as they are doted over the farm & generally not in line with an existing fence (much work & money to go out & around them & the single wires become a hazard to farmer and livestock). I know since I have tried it when I was trying to reduce the wear and tear on the walls of my waterholes from livestock (I ended up taking the wires down again).
				Bearing in mind that these man made water reservoirs act as silt and nutrient settlement ponds and filters. The whole of my top boundary is crop land so my farm acts as a filter and settlement pond (effectively) between those crop farms and the river. It is doing an important job. I need to empty my waterholes of their silt regularly. Foamy, sediment dense water pours onto my farm from the crop lands, through my bush and waterways regularly. The problem runoff is that which runs down the roads and straight into the waterways. We low intensity dry stock farmers who care about trees, animals, mirco-organisms and water should be rewarded for retaining the natural features & creating environmentally benefiting systems such as water catchments, rather than penalised.
				I have regularly seen cattle standing in & horses playing and rolling in the floods from the river but I have never seen them do so in my muddy little

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				<ul> <li>waterholes which fill from springs. Or even the dams as the silt/mud is too scary for them to go in to, they simply drink from the edges. They do go into the ditches to reach for the lush growth &amp; to drink.</li> <li>I think fencing off streams &amp; ditches on the flat or gently sloping land, which stock are inclined to graze &amp; go into to drink &amp; larger dams &amp; waterholes which are clean enough to become wadding holes is a good idea but I believe there are great benefits to the environment (&amp; to farmers of course) for allowing small waterholes for stock to drink from. Benefits to environment;</li> <li>1. Silt traps-I studied water health many years ago &amp; the advice was to catch the water at its source &amp; at various points along the water course on its way to the river (to catch &amp; settle out silt, fertilisers, sprays, manure etc), plant up the exit point with grasses etc to act as a filter, fence off down from it so the long grasses continue to filter it.</li> <li>I propose fencing of downward sides of waterholes while leaving the upper end as water holes for livestock, leaving only room for drinking &amp; not swimming &amp; allowing good access for weed control &amp; silt excavation</li> <li>2. Will encourage the creation of more traps (waterholes) at water sources as it becomes a viable way of replacing natural water they have been required to fence off</li> <li>3. Will reduce waterfall effect (flash floods) during wet weather as there will be more water catchments dotted along water courses to the streams, ditches &amp; rivers &amp; silt &amp; water filters along the way to slow it down &amp; filter it out.</li> <li>4. Great for birds &amp; frogs etc.</li> </ul>

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			Financially assist with installing regular troughs on farms with natural water where gravity from waterholes and springs is possible (still allow waterholes to be open as proposed also).	<ul> <li>5. Will reduce infrastructure required in drystock farmers ie-pumps, watersheds, pipes, tanks &amp; troughs</li> <li>6. Will reduce stress related to keeping water infrastructure operational particularly for dry stock extensively farmed land where many paddocks are only visited periodically (too labour intensive to treat a drystock farm the same as a dairy farm whose cattle are visited twice a day).</li> <li>6. Will reduce concerns about water during droughts &amp; reduce the requirement to draw from main water bodies</li> <li>Livestock will drink from the easiest source. Troughs are easier for them to drink out of than waterholes so waterholes would only be naturally used by livestock when something has gone wrong with the water reticulation, ie: the waterhole becomes the backup supply.</li> </ul>

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				Photo: An example of fence/weed maintenance problem when stock are excluded for only one year. Due to manual labour (eg; weed eating all the fencelines) no longer being an affordable expense on small beef farms nowadays, copious amounts of spray would be required to maintain all stock excluded areas/waterways.
				Weed control would become a big problem plus simply keeping the long grass off the electric wires.
				I suggest opening up retired areas for short spells twice a year (during drier periods) to graze off so that the fences can be released & noxious weeds can be more easily found & accessed/dealt to - otherwise we will all need to spray copious amounts regularly along the whole perimeter of waterway fences. The chemical going straight into our rivers.

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				Ideally, as I dont have time myself I would need to pay a spraying contractor to spray it twice a year however I dont have enough income for that so its an additional job for myself, one which will also require me to somehow acquire the equipment to do it effectively & safely. Im very concerned also due to being extremely sensitive to the chemicals (I actually think EVERYONE is) which lays me up for days after each 'small' spraying episode. Then how good is this for the environment!?!? We all know that frogs, kura, fish & eels cant handle it, not to mention the millions of micro-organisms we cant see. I do not believe that it does not hurt the soil, the service waterways, the underground waterways, the critters or the eco system as a whole. I would prefer the little amount of manure my farm would add to the waterways than the truckloads of spray that would be required to control the weeds plus the increase of noxious weeds which occurs in retired areas. Please bear in mind that the longer the foliage the more chemical that is required.
			Allow for plenty of machinery access	Fencing both sides-how do we maintain the ditches/streams for silt build up (I'm down below cropping plateaus & need to dig out silt from waterholes & ditches regularly or the water ends up flowing over the top of the dirt at the same level as my paddocks)
			Schedule 1. A.2.(b) (ii) Please define 'where practicable'	What I believe is practicable may not be what the council or a Certified Farm Advisor terms practicable eg: digging out a steep hill in order to re run a track which is currently within the stipulated setback alongside a waterway in my opinion is not practicable butits subjective.
51	Schedule 1: Requirements for Farm Environment	SUPPORT with	Individual LEPs individual to each farm without blanket rules. Guidelines for farmers and then	The reason I voted for 'individual' LEPs in the CSG survey is to allow for the different needs of each farm while considering the needs of the environment & to assess each property as to the objectives; negative and

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	Plans	amendments	Certified Farm Advisors to review and advise on possible ways to make the plans more effective and where they are expressly not meeting the guidelines.	<ul> <li>positive impacts on each farm. What has ocurred instead is the blanket regulations I was trying to avoid and we all have to pay large fees to have a plan made outlining how we have to stick by those blanket regulations in order to achieve compliance.</li> <li>I think the PC1 needs more work. Howto work with all the variables farm to farm &amp; to give Certified Farm Advisors the authority, within boundaries, to work with farmers on how they may remain profitable &amp; their farms remain manageable while staying within reasonable perameters (NOTE: this would not be so difficult to achieve if farmers are rewarded/compensated as per my earlier suggestions).</li> <li>Example scenarios</li> <li>A farm who has retired 20ha of land could well be forgiven for not fencing off an impractical steep area of springs</li> <li>A small farm rich in bush, rejuvenating bush and water impractical to fence due to limited remaining land, difficult terrain &amp; large number of small tributaries could be forgiven hillside exclusion due to maintaining very low cattle stock numbers.</li> </ul>
			Extend the date to achieve a FEP	Allow more time for the Council to decide how to recruit & train Certified Farm Advisors since a lack of appropriate and qualified Certified Farm Advisors will cause conflict, time issues plus push up the price farmers will have no choice but to pay. Allow more time for farmers to learn and achieve much of their FEP work themselves
			Insist upon Certified Farm	

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			Advisors/trainers becoming registered with the NZTE business partner scheme.	So farmers may apply for 50% govt funding of their LEP & NRP training (ie: the Certified Farm Advisors teach and assist them to do it themselves)
			And the healthy rivers scheme	http://www.regionalbusinesspartners.co.nz/
			subsidise the remainder (which is essentially a tax to all NZers to assist to clean up waterways)	(Farmers could be encouraged to do their health & safety manuals at the same time!!! Seems to be lacking on farms still & very hard to do)
			Advise what you envisage will be the audit time & costs? Yearly? How will we fund those. I suggest they should funded by the council rather than the farmers.	Administering & enforcing of council policies & regulations should not be the cost of individuals in the community. It currently appears to be an unknown cost & would be difficult for farms/lifestyle properties which are already unprofitable and another potentially 'blow out' cost chipping away at profit for the rest.
			NZ beef and lamb & other farmers support networks to have registered trainers & auditors	We already pay them levies, memberships etc to support us. One stop shop for all compliance & administrative needs. I trust them more than I trust the council Im afraid.
			Need flexibility on planning	-dry stock farmer's plans are constantly changing depending on
				<ul> <li>Weather</li> <li>Market demand</li> <li>Price of livestock</li> <li>Price of feed</li> <li>Family conditions eg-family member gets sick-sell some</li> </ul>

Page No	<b>Reference</b> (e.g. Policy, or Rule number)	Support or Oppose	Decision sought Say what changes to Plan Change 1 you would like	Give Reasons
				<ul> <li>time this year I need to free up time so I wish to lease out the majority of my land (they will likely want to carry more SU than I have done in the past)</li> <li>No money in meat so lease as much out to crop contractor as possible until meat market lifts again etc</li> <li>New innovations eg: if a new crop becomes apparent to be good (manuka cultivation at present is of interest. Im also curious about flax cultivation in the future) it appears we would need to get a consent to give it a try,</li> <li>Financial constraints eg: in order to do some capital improvements I can currently sell some livestock to pay for it and lease some of the land to a cropping firm to counteract the loss in income until I save up to re purchase stock.</li> <li>PC1 appears to destroy the concept of mixed farming and innovation (trialling new ways to farm effectively and profitably) &amp; moving with the</li> </ul>
			Allow some paddock rotation for health of farm and income Certified farmer advisors must	market and technology. Farmers need to be able to do some cropping periodically eg: if feed price takes a hike & they need to grow their own or meat prices take a dive so it's more profitably to use the flats for cropping. And it is good for the health of soil to 'mix' farm eg: have a paddock as pasture for a while then cultivate a deep rooting crop for a year or two etc. And to move with the markets eg: when something becomes in demand, we wish to be able to give it a go without costly & time consuming consents (particularly since giving something a go often doesn't work out & we make a loss on it).
			have experience in the type of farm they will be advising on and to have farmed in the same district themselves (same soil types, rainfall etc)	A dairy farmer is not suitable to work with a dry stock farmer and a gentle dry stock farmer is no good for a hill country dry stock farmer