

# 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

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

## SUBMISSIONS CAN BE

<b>Mailed to</b>	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
<b>Delivered to</b>	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
<b>Faxed to</b>	(07) 859 0998 <i>Please Note: if you fax your submission, please post or deliver a copy also</i>
<b>Emailed to</b>	<a href="mailto:healthyivers@waikatoregion.govt.nz">healthyivers@waikatoregion.govt.nz</a> <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>
<b>Online at</b>	<a href="http://www.waikatoregion.govt.nz/healthyivers">www.waikatoregion.govt.nz/healthyivers</a>
<b>We need to receive your submission by 5pm, 8 March 2017.</b>	

## YOUR NAME AND CONTACT DETAILS

Full name Euan and Sarah McKnight		
Full address 180, Deep Creek Road, RD!, Reporoa		
Email. <a href="mailto:icase@farmside.co.nz">icase@farmside.co.nz</a>	Phone 07 3338225	Fax

## ADDRESS FOR SERVICE OF SUBMITTER

Full name		
Address for service of person making submission		
Email	Phone	Fax

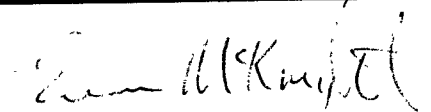
## PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

I wish to speak at the hearing in support of my submissions. ( YES )
I could not gain an advantage in trade competition through this submission. ( COULD NOT ).

**SIGNATURE OF SUBMITTER**

*(or person authorised to sign on behalf of submitter)*

*A signature is not required if you make your submission by electronic means*

Signature 	Date 7/2/17
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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**

I own a 123 ha dairy farm. We milk 320 cows.

I run a low input system. We are stocked at 2.6 cows / ha and try to fully feed the cows with grass.

Supplements are only used in periods of a feed deficit...early spring or a dry summer.

We grow a summer crop as an insurance against dry summers. Direct drilling is practiced as much as possible for cropping and re grassing.

We try to keep N use at a minimum ( 45 -55 kg N/ ha ). Soil tests are done annually and used to calculate optimum fertiliser requirements.

We have just completed an upgrade of our stock underpass by concreting 10 metres on each side of the underpass. This has greatly improved stock flow and the damage done to the existing pumice races. Runoff from the concrete is captured in a formed catchment area. A concrete tank is due to be installed as soon as we can.

Total spent so far is just over \$8000.

In the future, I plan to complete re grassing the remainder of the farm. This will allow us to increase production and increase our herd numbers slightly.

It is our aim to be able to employ a contract milker within the next 3-5 years so we need a lift in production to make this viable.

Over the next few years we need to upgrade our effluent system to be fully compliant.

This will cost us in the region of \$100,000. To help make this feasible , we need to have the ability to lift production of the farm. We believe we can do this with minimal increase in Nitrogen use, however any constraints on further fertiliser use and a possible requirement to decrease our Nitrogen use will impact on our production and any plans to increase our profitability .

I am concerned about the following issues with PC1.

Our concerns are that should our profitability be hindered then :-

- ( a ) We will not be in a position to upgrade our effluent system.
- ( b ) Any constraints on our future profitability will make it difficult to employ a contract milker.
- ( c ) A reduction in profitability could affect the security of our current employees position.

Our staff support a family.

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 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	<b>OPPOSE</b>	Amend 3.11.5.3 as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including :-</p> <p>The dates proposed for the FEP's are too restrictive. We already operate a low input, low N leaching system and know that we can continue to operate a responsible and profitable farm whilst still striving to increase production and profit.</p> <p>Our N leaching is consistently in the range of 35 -40 kg / year.</p> <p>We strongly disagree with having to adhere to any plans to reduce this whilst there are farmers who have only to reduce to the 75th percentile and will still have a higher figure than us.</p> <p>We are basically subsidising these farmers.</p> <p>I am also concerned that this is not practical because we already have a low N figure and any further effort to lower it further could impact greatly on our business.</p>

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42	<b>Rule 3.11.5.4</b> Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	<b>OPPOSE</b>	Amend 3.11.5.4 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities including the real possibility of us having to cease employing our staff. We will find it difficult to justify any future expenditure on upgrading our effluent system and any further developments for our farm ( water system, planting shelter belts, upgrading staff accomodation )
44	<b>Rule 3.11.5.5</b> Controlled Activity Rule – Existing commercial vegetable production			
45	<b>Rule 3.11.5.7</b> Non-Complying Activity Rule – Land Use Change	<b>OPPOSE</b>	Amend 3.11.5.7 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities including our ability to grow our business and to remain profitable
46	<b>Schedule A:</b> Registration with Waikato Regional Council			

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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 my farming activities including our ability to service our debt.</p> <p>Having progressed through the share milking system and then borrowed heavily to buy our farm, we can not afford to reduce our profit so we can continue repaying debt.</p> <p>Should the future value of our farm be affected by these proposals then we may be put in a position that forces a sale . A drop in land value will greatly affect our equity position.</p> <p>Any N loss restrictions imposed on us will have a strong negative effect on our overall resilience during times of low milk price or drought.</p> <p>I am also concerned that this is not practical because as we already have a low N loss , any further reduction required will have to come from reduced fertiliser use which will require a reduction in stock numbers and so reduced production and profit.</p>

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50	Schedule C: Stock Exclusion	OPPOSE	Amend Schedule C as requested by Federated Farmers in their submission.	Stock are already fully excluded from all water ways on our farm.



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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 my farming activities including the loss of flexibility for us to use our land. During low payouts we have had to bring our young stock back from grazing and feed them on the farm using bought in feed. This in turn increases our stocking rate. Will this be impacted by restrictions ??</p> <p>Should we be able to employ a contract milker then we would hope to purchase or lease a runoff to support the dairy farm and give us more control over our off farm grazing. Again ,we could be affected by any restrictions.</p> <p>I disagree strongly with the use of "Overseer " to implement a FEP. Overseer has been problematic from its inception. Each new version results in a different N loss figure.</p> <p>Should Overseer information be used to implement our FEP, our calculated N loss may then be different should a new version of Overseer be used. If this figure increases simply due to the new Overseer then our original FEP was based on wrong information .</p> <p>Nitrogen is not the main contributor to reduced water quality. Phosphate , sediment and E.coli are the main issues.</p> <p>The main contributors of E.coli are the local wildfowl and the urban areas NOT farming.</p>