From: Healthy Rivers Subject:

Tuesday, 7 March 2017 9:24:47 p.m. Attachments

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Proposed Waikato Regional Plan Change 1 - Waikato and Waipa River Catchments.



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

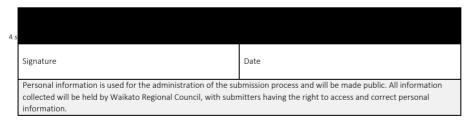
Mailed to	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton		
Walled to	3240		
Delivered to	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton		
Faxed to	(07) 859 0998 Please Note: if you fax your submission, please post or deliver a copy also		
	healthyrivers@waikatoregion.govt.nz		
Emailed to	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.			

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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.

I could not gain an advantage in trade competition through this submission.



SUBMISSION POINTS: General comments

My wife and I are 50-50 sharemilkers in the Reporoa area. Currently we calve 510 cows on 180 hectares which is supported by a 100 hectare runoff.

As the third generation of our family lucky enough to farm our piece of land, we view the long term sustainable management of our business as being of extreme importance. We are a type 2 unit that focuses on harvesting top quality grass to feed our animals with minimal fertiliser input. In fact for the past 2 seasons we have applied just 17units of N/Ha.

In the future, I plan to sustain the farming operation that has taken generations to arrive at. The hard work and sacrifice that has been required to get to this point is an area very few could grasp, nor would attempt.

I am concerned about the following issues with PC1. To begin with, these suggested changes seem to be driven by emotion rather than by fact. It is embarrassing when listening to some of the dialogue with regard to Nitrogen loss for starters. As stated, we apply a relatively small amount of N but yield on average 13 to 14 Tonnes of dry matter per hectare per year. Each year it is suggested that I leach 2 to 3 times more N than I apply. How this result possible. Surely it should suggest that the process is flawed. If I was to put on no fert for one season I would still get a reasonable level of N leaching. That must suggest that all lands leach N surely. It is widely known that some of the highest N leaching land sits nowhere near any farmland especially dairy, but sits in the confines or urban areas, or council controlled zones. Where is their accountability. Just how much raw sewerage needs to enter our local beaches from faulty septic tanks and sewers before real change is made. When are we going to realise as a nation that humans create waste at a rate that far exceeds that of our small farming community. A community that boasts a few thousand cows, but if this land was in

Auckland, it would boast probably a quarter of a million people. Tell me, what has the greater impact. My cousin in Auckland firmly believes that if Dairying was banned, then their beaches would always be swimmable, and shellfish beds always safe to eat. Really, is that what it's come too?? We have a dumb downed public that hopes a solution will be found to their issues, created by them, without having to put their hands in their pockets, nor change their ways. If this submission goes through there will be significant effects on rural communities. I didn't realise we all should live in Auckland!! When our rural communities are strong, this country is strong. When people speak of New Zealand, they speak of the scenery, not of Aucklands clogged motroways and unswimmable beaches. Farming and tourism in our area have always gone hand in hand, providing opportunities for young folk and old. Sustainable and sensible management of both are needed to retain our nations sense of identity. As the local iwi have always stated, we all want rivers to be proud of, but it cannot be at the expense of our communities.

This dialogue may be seen as just a rant, but as a father of 3 energetic non-ipad driven children I feel I owe it to them to provide a farming opportunity for them in the years to come. What father wouldn't.

I support the submission that has been lodged by Federated Farmers. I am particularly concerned about the following aspects of Plan Change 1:

- The significant negative effect on rural communities
- · The cost and practicality of the rules.
- The effect that the Nitrogen Reference Point will have on my business and my economic wellbeing.
- The Farm Environment plan requirements leading to unnecessary and costly regulation of inputs, outputs, normal farming activity and business information
- The costs and practicality of the rules and requirements for stock exclusion, the Nitrogen Reference Point and the Farm Environment Plan.
- The timeframes for complying with the Nitrogen Reference Point rules which are too short and unachievable
- The plan significantly exceeding the 10 year targets in many attributes and areas
- The lack of science and monitoring at the sub catchments level

I wish to be heard at the Hearing.

I am concerned about the implications all of this will have for my property and for my current activity as described above. I set out my concerns more specifically in the table below.

SUBMISSION POINTS: Specific comments

Page No	Reference (e.g. Policy, or Rule number)	Support or Oppose	Decision sought Say what changes to Plan Change 1 you would like	Give Reasons
40	Rule 3.11.5.2 Permitted Activity Rule – Other farming activities			
41	Rule 3.11.5.3 Permitted Activity Rule Farming activities with a Farm Environment Plan under a Certified Industry Scheme	OPPOSE	Amend 3.11.5.3 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities including the ability to farm through significant weather events. I am also concerned that this is not practical because all it will succeed in doing is creating more middle management jobs that could be nullified through other measures.
42	Rule 3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	OPPOSE	Amend 3.11.5.4 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities. If the 75 th percentile is bought in on someone putting on 300units of N, it will drop them to 225, a reduction of 75 units which will have minimal impact on them. Our 17 units will drop to 13, a reduction of 4. Someone putting on 225 units is still having a reasonable bearing on potential leachate whilst our 13 is not. Surely a capped level per area is far more sensible so those that have not created the problem have the ability to up to the cap in future. Surely you would treat all people the same and not create a class system.

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.	
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.	This proposal will impose significant costs on my farming activities including how fair is this reference point given that we have always run a sutainable operation that has developed healthy soils over several generations. Others who have ploughed tonnes of chemical ferts into their lands are seemed to be able to continue this way of farming whilst those that have had little impact get constricted even more. I am also concerned that this is not practical because the science behind the data is still being refined.
50	Schedule C: Stock Exclusion	OPPOSE	Amend Schedule C as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities including the continuation of the fence maintenance and weed control we started back in 1953!!! At present we have fenced off roughly 28 hectares at todays cost of 40000 per hectare equals 1.012 million. On top of that you have all the fencing, planting, weed control. Who knows what it's cost if you even begin to include our families time. Time that for me started when I was just 2 helping clear blackberry. Maybe some of the ignorant people of this country would like to purchase their own streams at this expense and maintain them for no financial gain. No, I thought not.
51	Schedule 1: Requirements for Farm Environment Plans	OPPOSE	Amend Schedule 1 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities including not being able to farm the land as is needed for the furture sustainability of our business. If we can't cultivate on land greater than 15 degrees, then no land should be used if that gradient is exceeded. One rule for all aspects of landuse, you might find then the Hamilton dump might stop leaching into the Waikato!!