#### **Submission Form**

Submission on a publically notified proposed Regional Plan prepared under the Resource Management Act 1991.

On: The Waikato Regional Councils proposed Waikato Regional Plan Change 1 -

Waikato and Waipa River Catchments

To: Waikato Regional Council

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Complete the

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I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

If others make similar submissions, I would consider presenting a joint case with them at the hearing.

mf	8/3/2017
Signature	date
Signature	date

#### Introduction

Thank you for the opportunity to submit on the Waikato Regional Councils proposed Plan Change 1.

My name is Kim Avery and I am a beef farmer in partnership with my husband and father. My family have been farming this property for 17 years. The property size is small in size at 193ha. I manage the farm whilst my husband must work off the farm to enable the family to manage financially. My father owns the property and has retired. I have a vested interest in being a sustainable farmer to ensure the land remains in my whanau for years to come. Efforts we have made over the past years have included fencing a native bush area and the creation of an ecological pond surrounded by aesthetically pleasing tree plantations. We have upgraded races and fencing to enhance stock management and minimise sediment leaching.

Further more I wish to express my concern in respect of:

- The lack of representation of beef and sheep farmers on the Collaborative Stakeholders Group.
- Suspicion that the council is acting unlawfully in terms of its power I believe to be an example of ultra vires.
- Concern that farm owners are being unfairly targeted when specific scientific research indicated that levels of pollution peak primarily downstream from large urbanisation. Dams and roads are also a large contributor to this problem.
- Small scale farming may be the hardest hit with financial strain already an issue. This will lead to large corporate style farms being dominant in the sector thus reducing rural communities.
- The damaging cost to one of the countries largest industries.

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

- The significant negative effect on rural communities
- The cost and practically 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 catchment level

The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following table. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan, including Objectives, Policies, or other rules, or restructuring of the Plan, or parts thereof, to give effect to the relief sought.

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
Schedule 1: Requirements for Farm Environment Plans	oppose	The farm Management Plan will incur an exorbitant cost to the farmer and require time which will be taken away from the practice of farm duties.	Amend schedule 1 as requested by Federated farmers in their submission
		It will require a professional consultant to whom we have no reference point to guarantee that they have the expertise or competencies to adequately produce an accurate plan.	
		The fact that stock rates are the only determinant to leaching of Nitrogen, sediment and microbial pathogens. There is soil types, size of stock and many other factors that have not	

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		been factored into this less than scientific equation.	
Schedule B: Nitrogen Reference point	Oppose	The proposal restricts future farming practices set by the proposed arbitrary stocking levels.  The use of stock numbers over 2 consecutive years is not scientifically random nor a true understanding of overall stock numbers that this farming property can manage sustainably and at an environmentally responsible level.	Amend Schedule B as requested by Federated Farmers in their submission
Rule 3.11.5.4 Controlled Activity Rule	Oppose	The catchment areas are too broad and ought to be broken down into smaller sub-catchment areas. There are many microclimates, elevations, run off into lakes/ dams and soil types within these large areas. All these points make a huge impact to leaching of Nitrogen and sediment into the Waikato river.  For those areas that are currently compliant, farmers are being	Amend Rule 3.11.5.4 as requested by Federated Farmers in their submission.

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		disadvantaged with having to meet wider compliance at a financial and time cost.	
		·	

The specific provisions my submission relates to are:	· ·		The decision I would like the Waikato Regional Council to make is:

Signature

8th March 2017