

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

Submission form on publicly notified – Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

SubForm	PC12016	COVER SHEET	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

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

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

YOUR NAME AND CONTACT DETAILS		
Full name Nick & Cathy Prendergast		
Full address 42 Pukewhau Rd, R.D. 7, Te Awamutu, 3877		
Email cathynic@xtra.co.nz	Phone 078724570	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name 42 Pukewhau Rd, R.D. 7, Te Awamutu, 3877		
Address for service of person making submission 42 Pukewhau Rd, R.D. 7, Te Awamutu, 3877		
Email cathynic@xtra.co.nz	Phone 078724570	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

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

SIGNATURE **OF** **SUBMITTER**
(or person authorised to sign on behalf of submitter)
Signature is not required if you make your submission by electronic means.

Signature	Date 8 March 2017
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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

We own a 147ha dairy farm, plus we lease 30ha added to the milking platform, and a 40ha runoff. We are in Priority 2 FMU. Waipa River Freshwater Management Unit.

We farm at a stocking rate of 3.4cows/ha. The environmental projects which we have undertaken are installing an effluent system which includes a lined storage pond (\$120,000), the outcome is that we have control over the irrigation of effluent to pasture, and fencing of waterways.

In the future, we plan to invest in environmental projects of fencing the remainder of the small waterways on the farm, this is a significant investment of time and money for our business.

I am concerned about the following issues with PC1, the costs to our business to fence the remainder of the very small waterways on our property, the ongoing administrative and compliance inspection costs, the probable downscaling of production on our farm to be compliant with Nitrogen Reference Point, the timeframes for complying will be difficult and will not give us sufficient ability to improve our financial position to be able to take such a severe financial setback, having read the 'Economic Evaluation of Scenarios for Water Quality' from Waikato Regional Council, we do not feel confident with the level of science that we have seen regarding water quality, the causes of the current situation, and the possible remedy to it, for this to be relied upon when it is going to cause such severe financial, employment and community impacts on the Waikato Region. We are very concerned regarding the hugely negative impact on rural communities and their support industries, and the cumulative strain and inevitable mental health issues which will eventuate.

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 my profitability 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	Oppose		
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.	<p>This proposal will impose significant costs on our farming activities including the dates are to restrictive as they will not allow us the time to improve our financial position to cope with the ongoing extra costs. We would be concerned that we fall into the 75th percentile Nitrogen group and dropping our nitrogen applications and the level of bought in feed, will affect the profitability of our farming business. We expect for all the changes resulting from the PC1 to result in a decrease of in excess of 20% of our total business. This is not sustainable for us.</p> <p>I am also concerned that this is not practical because dropping our profitability will affect our ability to service our mortgage, and our ability to support the community with the level of employment we currently have.</p>

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42	Rule 3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	OPPOSE	Amend 3.11.5.4 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities including the dates for the FEP are too restrictive because they do not allow us time to improve our financial position to better cope with the changes, and the 75 th percentile will restrict us and our level of production, therefore our profitability of an estimated 13% or more.

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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.	This will stop our proposed business expansion, drop property values and completely halt economic growth in the region.
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 the impact of nitrogen loss restrictions will severely restrict the profitability of our business, we cannot fund all the changes required for PC1 out of a markedly decreased cashflow with the ongoing costs of the administrative and compliance costs.

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50	Schedule C: Stock Exclusion	OPPOSE	Amend Schedule C as requested by Federated Farmers in their submission.	<p><i>This proposal will impose significant costs on my farming activities including the physical cost of the fencing, we will in time meet these costs, but if we have to fund this out of cashflow with a reduced Nitrogen Reference Point, we will not be able to do both.</i></p> <p><i>I am also concerned that this is not practical because fencing the waterways will create an environment which will harbour rodents, stoats and weasels, and opossums, which will not be advantageous to the eradication of TB which is a threat to our export industries.</i></p> <p><i>Fencing will necessitate an increased number of culverts and crossings for access, which will significantly increase the costs of the project.</i></p>
51	Schedule 1: Requirements for Farm	OPPOSE	Amend Schedule 1 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities including the inability to cultivate land that slopes >15degrees. This will mean that we are

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
	Environment Plans			<p>severely restricted in where we can cultivate to crop for winter feed requirements. The resulting cost to our business we estimate to be a reduction in Milk Solids of 13%. (\$185,000/year) This is not sustainable for our business or mortgage commitments.</p> <p>The fencing requirement is restrictive and expensive.</p>