

# 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	
<b>FOR OFFICE USE ONLY</b>			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

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:healthyrivers@waikatoregion.govt.nz">healthyrivers@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/healthyrivers">www.waikatoregion.govt.nz/healthyrivers</a>
<b>We need to receive your submission by 5pm, 8 March 2017.</b>	

YOUR NAME AND CONTACT DETAILS		
Full name Norman James Bleakley		
Full address 148 Rotongaro road, RD2, Huntly, 3772		
Email <a href="mailto:bleakleyjm@gmail.com">bleakleyjm@gmail.com</a>	Phone 078266723	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name Normn James Bleakley		
Address for service of person making submission 148 Rotongaro Road, RD2 Huntly, 3772		
Email <a href="mailto:bleakleyjm@gmail.com">bleakleyjm@gmail.com</a>	Phone 078266723	Fax

PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION
<input type="checkbox"/> I wish to speak at the hearing in support of my submissions.
* <input checked="" type="checkbox"/> 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.

**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 08/03/201713**

**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 131ha dairy farm milking 340 cows in FMU 3. I also own a 55ha dairy support block in FMU 1.

I run a low input farm system. Farm is categorised as a system 2 using less than 15% brought in deed. Stocking rate is low at 2.5 cows/ha. I have a low nitrogen use policy using less than 90kgN/ha/yr.

I am concerned about the following issues with PC1: The requirement to have a farm environmental plan (FEP) and the restrictions that it will impose.

The requirements of the FEP is not practical to my farm operation and will severely limit what I can do. In particular I have concerns regarding the requirement to not cultivate any land greater than 15 degree slope. Approximately 50% of my dairy farm and 70% of my support block have contour greater than 15 degrees. The farm system I run is low input and relies heavily on growing feed on farm. Approximately 10% of my land is cultivated each year to grow crops for the animals and improve pastures. Much of the cultivation occurs on contour greater than 15 digresses. If I am unable to continue to do this it will limit the amount of feed I can grow for my animals and therefore affect the productivity of my business. In turn I will have to purchase feed and this will add significant cost to my business. It will also impact the practicality of my farming operation as many of my paddocks have a mixture of contour meaning some parts of the paddock can be cultivated and some can not. It is not practical to have part of a paddock cropped and part not.

There will also be further detrimental environmental impact as I will have to continuously cultivate the areas of my land that are less than 15 degrees. This will lead to loss of soils structure, soil erosion and nutrient runoff. I believe this will have a greater negative environmental impact than if I am able to continue to cultivate areas over 15 degree slope.

If I am unable to grow as much feed and purchased feed becomes scarce and too expensive I will be forced to lower my stocking rate with in turn will be detrimental to the financial viability of my business.

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**

<b>Page No</b>	<b>Reference</b> (e.g. Policy, or Rule number)	<b>Support or Oppose</b>	<b>Decision sought</b> Say what changes to Plan Change 1 you would like	<b>Give Reasons</b>
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 the cost of getting a FEP. This will be a significant cost with is financially not practical. It will increase the cost of feeding my animals as if I can not grow as much feed for my animals I will have to rely on purchased feed with will increase my business costs.</p> <p>I am also concerned that this is not practical because too much of my farm will not allowed to be cultivated. This will limit the productivity of my farm. It will limit how much food I can grow for my animals and limit my ability to improve pastures through re-grassing. In many of my paddocks only part of the paddock will be able to be cultivated and this is not practical and will lead to waste land and increased weeds.</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.	<p>This proposal will impose significant costs on my farming activities including the cost of getting a FEP. This will be a significant cost with is financially not practical. It will increase the cost of feeding my animals as if I can not grow as much feed for my animals I will have to rely on purchased feed with will increase my business costs.</p> <p>I am also concerned that this is not practical because too much of my farm will not allowed to be cultivated.</p>

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				This will limit the productivity of my farm. It will limit how much food I can grow for my animals and limit my ability to improve pastures through re-grassing. In many of my paddocks only part of the paddock will be able to be cultivated and this is not practical and will lead to waste land and increased weeds.
44	<b>Rule 3.11.5.5</b> Controlled Activity Rule – Existing commercial vegetable production			
45	<b>Rule 3.11.5.7 Non-Complying Activity Rule</b> – Land Use Change			
46	<b>Schedule A:</b> Registration with Waikato Regional Council			

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47	<b>Schedule B:</b> Nitrogen Reference point			
50	<b>Schedule C:</b> Stock Exclusion			
51	<b>Schedule 1:</b> Requirements for Farm Environment Plans	<b>OPPOSE</b>	Amend Schedule 1 as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including The farm plan requirements are not feasible.</p> <p>As much of my farm has a slope greater than 15 degrees too much of my farm will not allowed to be cultivated. This will limit the productivity of my farm. It will limit how much food I can grow for my animals and limit my ability to improve pastures through re-grassing. In many of my paddocks only part of the paddock will be able to be cultivated and this is not practical and will lead to waste land and increased weeds.</p>