

# 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: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 Daniel John Sullivan		
Full address 1174 Poihipi Road, RD1, Taupo		
Email daniel.sullivan@intelact.com	Phone 027 222 4025	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name Daniel John Sullivan		
Address for service of person making submission 1174 Poihipi Road, RD1, Taupo		
Email daniel.sullivan@intelact.com	Phone 027 222 4025	Fax

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

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 4.4ha lifestyle block/farmlet 12km from Taupo, in the Upper Waikato FMU. I am also a Production Animal Veterinarian and an NZIPIM Certified Dairy Farm Systems consultant working throughout the Central Plateau, with clients from Taupo in the South to Mamaku in the North.

I wish to be heard at the Hearing.

I am concerned about the implications all of this will have for my clients and their farming activities. 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> <b>Say what changes to Plan Change 1 you would like</b>	<b>Give Reasons</b>
40	<b>Rule 3.11.5.2</b> Permitted Activity Rule – Other farming activities	<b>OPPOSE</b>	The rule 4c (no part of the property or enterprise over 15 degree slope is cultivated or grazed) is prohibitive.	If there are no waterways on the farm or in direct line of any potential runoff, then grazing land over 15 degree slope carries no risk of sediment, phosphate or pathogens entering the waterways.
41	<b>Rule 3.11.5.3</b> Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	<b>OPPOSE</b>	Allow Priority 1 farms to submit FEP by 2021.	The proposed timeframes for the FEP to be completed in the priority 1 sub-catchments is short - especially when taking into account that the NRP data will only likely be available 1 year prior to the requirement for the FEP to be submitted. Any farmers who are in the top 25% of NRP will only have a year to engage a consultant to help them determine how they will reduce their N loss to the 75th percentile by 2026 and prepare a FEP detailing this. My concern is the ability of the industry to have suitably trained and qualified people to complete this process (within the given timeframe).

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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>	Allow Priority 1 farms to submit FEP by 2021.	The reasons are the same as for the above Rule 3.11.5.3.
46	<b>Schedule A:</b> Registration with Waikato Regional Council	<b>SUPPORT</b>		This process will ensure that the Regional Council has information to help manage this process.
47	<b>Schedule B:</b> Nitrogen Reference Point	<b>OPPOSE</b>	Extend the reference point calculation years to 2011/2012, 2012/2013, 2013/2014, 2014/2015, 2015/2016.	Currently the recommendation within the Plan Change 1 for NRP calculations takes place over years (2014-15, 2015-16) where a large number of dairy farmers changed or modified some part of their farming system away from their long term farming practices due to the financial constraints of low milk prices. Amongst other modifications, these changes include stocking rates, milk production outputs, nitrogen fertiliser and feed inputs. Each of these system changes or modifications has a bearing on the total amount of nitrogen within the dairy farm system and hence the NRP. The NRP period for calculating NRP could be extended to 5 seasons (2011-12, 2012-13, 2013-14, 2014-15, 2015-16) to allow further analysis of systems in more representative years.

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50	<b>Schedule C:</b> Stock Exclusion	<b>OPPOSE</b>	Amend Schedule C as requested by Federated Farmers in their submission.	Although this will help control emissions into waterways, the implication of cost for many sheep, beef and deer farms are enormous. These farms may be facing changes under these rules which could render their business economically non-viable.