# 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 SHE	ET
	FOR OFFICE	USE ONLY	
		Submission Number	
Entered		Initials	

## 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 <b>Please Note:</b> if you fax your submission, please post or deliver a copy to one of the above addresses	
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 : Graham John Black

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Email gjpmblack@gmail.com

Phone 07 8254555

Fax

ADDRESS FOR SERVICE OF SUBMI	TTER		
Full name Graeme John Black			
Address for service of person mak	ng submission as above		
Email gjpmblack@gmail.com	Phone 07 8254555	Fax	

# TRADE COMPETITION AND ADVERSE EFFECTS (select appropriate)

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

Accept the above	provision
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Accept the above provision with amendments as outlined below

Decline the above provision

x If not declined, then amend the above provision as outlined below

## Amend as follows:

Set individual farm N usage on what each individual farm can sustain with regards to N leaching based on soil tests from individual farms.

# PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

x 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.

# JOINT SUBMISSIONS

If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

Yes, I have attached extra sheets.

x No, I have not attached extra sheets.

SIGNATURE OF SUBMITTER (or person authorised to sign on behalf of submitter) A signature is not required if you make your submission by electro	onic means.
Signature Spland	Date 6/3/2017
Personal information is used for the administration of the s collected will be held by Waikato Regional Council, with sul	

information.

PLEASE CHECK that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

# THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1 (continue on separate sheet(s) if necessary.)

**Requirement for N reference Point for all farms** 

# I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

(select as appropriate and continue on separate sheet(s) if necessary.)

Support the above provisions

Support the above provision with amendments

X Oppose the above provisions and I propose alternative suggestions

## **MY SUBMISSION IS THAT**

Tell us the reasons why you support or oppose or wish to have the specific provisions amended. (Please continue on separate sheet(s) if necessary.)

## 1) Context of my submission

This submission relates to a property at Horotiu. We own another property at Te Akau. We have owned the original 21ha Horotiu property since 1979 and purchased an additional 13ha approximately 10 years ago. This farm has been used for low intensive beef farming for 38 years. During this time we have fenced off the only permanent running drain and all but one of the other Drainage board drains have been fenced off.

## 2) Comments on N Benchmarking

The impact of N benchmarks on farmers and my own operation will be to severely limit future growth as it will significantly impact the capital value of the land farmed and developed over the last 38years into productive pastoral land by limiting the viability of the farm for future generations. I believe individual N benchmarking is unfair as our low use of N historically now disadvantages us compared to those who have histroically used significant and in some cases irresponsible quantities.

The intent is that individual farms N usage not be increased. This breeches fundamental property rights in that two farms on the same soils and slopes side by side, one running a low stocking rate system with substantial plantings and the other a more intensive regime will have different limits imposed. This is simply not fair. This will reduce the value of the low stocking rate farm (my own farm is in this category) as future purchasers will not be able to extract the potential from that farm compared to the one next door. This not only represents theft of property rights, it also limits growth in the region and penalises the low input farmer. Farmers operating dry stock operations on dairy suitable land, or dairy farms on land suitable for commercial growing will not be able to change land use type, even if completed using best available practices with a sound environmental plan, and the land is highly productive and environmentally suited to that alternative land use. Similarly, farmers contemplating changing land use to a less intensive operation are incentivised to remain at current intensity to preserve their historical use-based allocation.

# 3)Suggested Alternative to N benchmarking

Our 34ha has a range of different soil types and draining issues which is highly likely to affect the rate and manner in which N is leached. To understand the leaching issues, we believe a range of soil tests should be taken at different times of the year and from different locations on the farm. Only this information will provide the insights into the optimum levels of N usage for this property.

# I SEEK THE FOLLOWING DECISION BY COUNCIL (select as appropriate and continue on separate sheet(s) if necessary.)

# Additional sheet to assist in making a submission

Section number of the Plan Change	Support /Oppose	Submission	Decision sought
Please refer to title and page numbers used in the plan change document	Indicate whether you support or oppose the provision.	State in summary the nature of your submission and the reasons for it.	State clearly the decision and/or suggested changes you want Council to make on the provision.