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**WEBSITE: PPC2 Submission**

By paul\_charmley on Oct 15, 2019 11:43 AM

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**Description**

ProposedPlanChange2SubmissionID

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**Full name**

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I/we could or could not (select one) gain an advantage in trade competition through this submission

I/we could not

I/we am or am not (select one) directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade environment or the effect of trade competition

The specific provisions of the proposal that my/our submission relates to are as follows (please list the provision (policy or rule number) or part provision)

We own a 300 cow dairy farm on 106ha (effective) in the Tararua region. We are in a LUC 2 zone. We consider ourselves to be very environmentally conscious, as we have fenced our 4km of waterways, installing bridges to encourage fish refuges. We have our own native plant nursery, growing 1000 native trees each year, which we plant on our non-productive areas. We are a low-input farm (System 2), with a stocking rate of 2.8 cows per hectare. Our nitrogen leaching rate is 29kgN/ha. We have 1250mm rain per annum. We have already made significant changes to our farming system, with lower replacement rates (now 20%), we no longer have winter crops, and we have made efficiencies on farm, including now milking once-a-day. In the future we plan to invest in projects on our farm including more fencing of areas of bush/trees and planting areas adjacent to our streams. The existing nitrogen rules in the One Plan are affecting my property and farming, as we are now suffering sleepless nights with the questions in our minds - will we be able to farm in the future? Will our family have a future in farming? If we consider ourselves to be a 'low emitter', how are others who are leaching more nitrogen able to farm, and yet we may not be able to? I support the submissions that have been lodged by DairyNZ and Federated Farmers. I am particularly concerned about the following aspects of Plan Change 2: a. The significant negative effect on rural communities. b. The cost and practicality of the proposal, including the cost of obtaining consent, the cost of any Assessment of Environmental Effects required, the potential cost if the consent application is notified, and the cost of mitigation activities for reduction of nitrogen and other nutrients. c. The effect that meeting the Table 14.2 Cumulative Nitrogen Leaching Maximums (CNLMs) will have on my business and on my family's and my community's economic and social wellbeing. d. The uncertainties for my business if I am required to submit and comply with a Nutrient Management Plan (and/or Overseer budget) on an annual basis, and the ongoing uncertainty about how my farm will be impacted by future Overseer version changes. e. The lack of science and monitoring at the sub catchments level and the lack of relationship between Table 14.2 and the CNLMs, the N leaching from my farm, and the desired water quality objectives.

My/our submission is (state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made, giving reasons)

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 attached.

Upload additional pages of your submission here

Amend Policy 5-8 as requested by DairyNZ and Federated Farmers in their submission. Amend Method 5-12 as requested by DairyNZ and Federated Farmers in their submission. Amend Method 5-13 as requested by DairyNZ and Federated Farmers in their submission. Amend Policy 14-3 as requested by DairyNZ and Federated Farmers in their submission. Amend Policy 14-5 as requested by DairyNZ and Federated Farmers in their submission. Amend Policy 14-6 as requested by DairyNZ and Federated Farmers in their submission. Amend 14-1 to 14.2A Rules - Agricultural Activities as requested by DairyNZ and Federated Farmers in their submission. Amend definitions as requested by DairyNZ and Federated Farmers in their submission.

I/we wish/do not wish (select one) to be heard in support of my submission

I/we wish to speak in support of my submission

If others make a similar submission I/we will or will not (select one) consider presenting a joint case with them at a hearing

I/we will not

#### Requester Details

Requester Name	paul_charmley	E-mail Address	paul_charmley@yahoo.co.nz
Contact number	-	Mobile number	-
Department	-	Business Impact	-

Reference (e.g. Policy or Rule Number)	Support or Oppose	Decision Sought	Reasons
<b>Policy 5-8:</b> Management and regulation of intensive farming land use activities affecting groundwater and surface water quality	<b>OPPOSE</b>	Amend Policy 5-8 as requested by DairyNZ and Federated Farmers in their submission	<p>I support the amendments to focus this policy on “management” as I support the focus on management (which is a broader range of actions as opposed to simply regulating). However, I consider that Policy 5-8 needs to be amended to reflect the policy and rule framework for existing intensive farming activities that is proposed in the DairyNZ and Federated Farmers’ submission.</p> <p>I seek a reasonable consenting pathway for existing intensive farming activities as proposed in the DairyNZ and Federated Farmers’ submissions.</p>
<b>Method 5-12:</b> Innovative Land Use Research	<b>OPPOSE</b>	Amend Method 5-12 as requested by DairyNZ and Federated Farmers in their submission	<p>I support council working with industry and other groups to look at innovations to reduce nitrogen leaching, where these are financially viable and practical options for farmers. However I am concerned that the focus of this method is on finding ways to achieve the CNLMs in Table 14.2</p> <p>I agree with the DairyNZ And Federated Farms that the focus should be on finding reasonable low nitrogen leaching options but without locking in the CNLMs in Table 14.2 or requiring farmers to meet these numbers.</p>
<b>Method 5-13:</b> Provision of Information	<b>OPPOSE</b>	Amend Method 5-13 as requested by DairyNZ and Federated Farmers in their submission	<p>I agree that it would be helpful for farmers if Council published information about Overseer version changes and if we were able to use models other than Overseer to estimate nutrient losses.</p> <p>However I am very concerned that Council’s proposal to retain the LUC approach through Table 14.2 is that this will result in future plan changes. That continues the uncertainty we current face and is unacceptable to farmers. I do not know how future version changes to Overseer will impact on us, or our ability to meet the LUC numbers.</p> <p>I agree with the DairyNZ and Federated Farmers that this method needs to be changed and agree that a reasonable consenting pathway for farmers, not based on LUC, needs to be provided.</p>
<b>Policy 14-3:</b> Good management practices	<b>OPPOSE IN PART</b>	Amend Policy 14-3 as requested by DairyNZ and Federated Farmers in their submission	<p>I am concerned about how good management practices will be defined, interpreted and applied by Council and other plan users. I am also concerned about what it will mean for farmers who cannot meet the controlled activity rules.</p> <p>I support DairyNZ and Federated Farmers’ submission that the policy needs to be changed to provide a reasonable consenting pathway and greater certainty for farmers.</p>
<b>Policy 14-5:</b>	<b>OPPOSE IN PART</b>	Amend Policy 14-5 as requested by DairyNZ	I consider that greater certainty is required for farmers as to when the rules apply from, what is treated as

Management of intensive farming land uses		and Federated Farmers in their submission	<p>“existing” farmer and what year we are at in terms of Table 14.2.</p> <p>I support the changes as proposed by DairyNZ and Federated Farmers to clarify this and provide certainty, as well as a reasonable timeframe to achieve any nitrogen reductions required.</p>
<b>Policy 14-6:</b> Resource consent decision making for intensive land uses	<b>OPPOSE</b>	Amend Policy 14-6 as requested by DairyNZ and Federated Farmers in their submission	<p>I am concerned about the lack of consenting pathway for farmers that cannot meet the LUC numbers in Table 14.2. The numbers are meaningless for farmers like us, because they do not relate to our N leaching or to the water quality outcomes.</p> <p>Table 14.2 numbers also do not change, despite Overseer version updates that model new numbers on farm. This is very frustrating and upsetting as these numbers change despite no variations to our farm system, and also with no consequential updates to Table 14.2 to reflect the new outputs as a result of the Overseer version change.</p> <p>I support the changes sought by DairyNZ and Federated Farmers because they propose a reasonable consenting pathway while still achieving the water quality objectives.</p>
<b>14.1 to 14.2A Rules – Agricultural Activities</b>	<b>OPPOSE</b>	Amend 14.1 to 14.2A Rules – Agricultural Activities as requested by DairyNZ and Federated Farmers in their submission	<p>I am very concerned that as drafted, Plan Change 2 will not provide a pathway for many farmers. This will create significant anxiety, cost and uncertainty for the rural sector. For example if we are unable to obtain a consent, the bank may call-in the significant loan that we had to make to purchase the property! This will force us into bankruptcy and off the land which has been farmed by our family for 100 years.</p> <p>I am also concerned about the significant cost if we were to have to apply for a discretionary activity consent. Our business needs certainty to survive and we don’t have any certainty if we had to apply for a discretionary activity consent where we do not know the nitrogen reductions or if we could fund the application or if we would be granted consent.</p> <p>I agree with the DairyNZ and Federated Farmers proposal because it provides greater certainty for farmers while at the same time requiring reasonable nitrogen reductions and moving towards improving water quality.</p> <p>I agree that Plan Change 2 is an interim solution and that a more durable and appropriate solution needs to be a priority for the council and the whole community.</p>
<b>New definitions</b>	<b>N/A</b>	Amend definitions as requested by DairyNZ and Federated Farmers in their submission	I support the new definitions proposed by DairyNZ and Federated Farmers.