

SUBMISSION FORM

ON THE PROPOSED PLAN CHANGE 2

SUBMISSION DETAILS

52
21 OCT 2019

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1. I could not gain an advantage in trade competition through this submission.
2. I own a 250ha milking platform. 750 cows
3. Stocking rate is 3 milking cows/ha. Nitrogen leaching rate this 2019-20 season will be 31 units/ha.

We have invested \$2 million in reducing the N leaching footprint. There is a high level of detail that can be presented and explained around the investment; too much to present in this submission form. This allows us to meet Table 14.2 but not the old Table 13.2. This level of capital investment is not the pathway for all farmers.
4. In the future, I plan to spend more capital on a 20 million litre effluent storage pond and pumping equipment.
5. The existing nitrogen rules in the One Plan are affecting my property and farming. The existing rules are not practical or economic to meet. PC 2 is more realistic. PC 2 along with the addition of other mitigations that are not recognized in Overseer, would be far more effectual and economic in N leaching reduction.
6. I am concerned about the following issues with PC2 in particular, which are detailed below.
7. 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.
8. I wish to be heard at the Hearing.
9. 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.

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TO: Manawatū-Whanganui (Horizons) Regional Council

SUBMISSION ON: Proposed Plan Change 2 – Existing Intensive Farming Land Uses

Submissions must be received at Horizons by 5pm Monday 21 October 2019.

Please note that all submissions are public. They will be published in full and summary formats, on the Horizons website and in documents that are available to the public and media, following the close of the submission period.

- Please post your submission to Private Bag 11025 Manawatū Mail Centre, Palmerston North 4442; or
- Deliver your submission to the Horizons offices at 11-15 Victoria Avenue, Palmerston North; or
- Please email your submission to submissions@horizons.govt.nz

SUBMITTER DETAILS

Full name:

Russell and Karen Phillips
Waka Dairies Ltd

Email:

Russell.phillips@xtra.co.nz

(Please note that Horizons will use this email address to correspond with you during the plan change, unless an alternative method of service is indicated below.):

Postal address:

441 Kumeti Road
RD 2
Dannevirke, 4972

Preferred contact
number (daytime):

Russell: 027 4526709

2019/798

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Policy 14-6: Resource consent decision making for intensive farming land uses	OPPOSE	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 variation 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>
14.1 to 14.2A Rules – Agricultural Activities	OPPOSE	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.</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 required 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>
New definitions	N/A	Amend definitions as requested by DairyNZ and Federated Farmers in their submission.	I support the new definitions proposed by DairyNZ and Federated Farmers.

SIGNATURE

Signature: Russell Phillips

Date: 21/10/2019

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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Reference (e.g. Policy, or Rule number)	Support or Oppose	Decision sought Changes to Plan Change 2 you would like	Give Reasons
Policy 5-8: Management and regulation of intensive farming land use activities affecting groundwater and surface water quality	OPPOSE	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 DairyNZ and Federated Farmers' submissions.</p>
Method 5-12: Innovative Land Use Research	OPPOSE	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 famers. 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 DairyNZ and Federated Farmers 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>
Method 5-13 Provision of Information	OPPOSE	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 currently 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 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>
Policy 14-3: Good management practices	OPPOSE IN PART	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>
Policy 14-5: Management of intensive farming land uses	OPPOSE IN PART	Amend Policy 14-5 as requested by DairyNZ and Federated Farmers in their submission.	<p>I consider that greater certainty is required for farmers as to when the rules apply from, what is treated as "existing" farming and what year we are at in terms of Table 14.2.</p> <p>I support the changes 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>