

**WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 -
WAIKATO AND WAIPA RIVER CATCHMENTS**

Submission Form

Submission on a publically notified proposed Regional Plan prepared under the Resource Management Act 1991.

On: The Waikato Regional Councils proposed Waikato Regional Plan Change 1 - Waikato and Waipa River Catchments

To: Waikato Regional Council
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Complete the following

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I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

I wish to be heard in support of this submission.

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Mr. Gifford

8/03/2017

Signature

date

Signature

date

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Introduction

Thank you for the opportunity to submit on the Waikato Regional Councils proposed Plan Change 1.

I farm 426 ha in partnership with my wife on land that is in catchment no.19 as stated on Map 3.11-2 dated 3 December 2016.

The land is rolling to steep limestone country made up of 365 ha in grass and the remainder in native bush and 31ha of forestry plantation.

On this we farm sheep and beef at a ratio of 52% cattle to 48 5 sheep.

This mix of cattle to sheep has been static over many years and tailored to environmental sustainability. The farm's profitability would improve significantly if the ratio of cattle was increased but as this would push cattle onto erosion prone steeper land, I have chosen not to do this. Also the class of cattle farmed are predominately rising yearlings which cause much less damage to the environment than older cattle.

My family has farmed our land since 1946 when my father won a ballot as a returned serviceman. My wife and I purchased the original 220ha in 1987 and have expanded it to its present size.

Future development of the farm will concentrate on improving production from our better classes of land. Less productive land will be farmed at sustainable stocking rates and 65ha has been identified for retirement. This land consists of steeper, erosion prone cliff-faces and ridges as well as wetlands.

My wife and I believe that as farmers we are only custodians of our land who have a duty to farm using environmentally sustainable practises. To this end we have planted over 1500 poplar and willow poles on erosion prone hillsides and have excluded stock from 26ha of rejuvenating and mature native bush.

Lastly my wife and I would like to comment on the so called collaborative approach used in the creation of Healthy Rivers – Plan change 1. We believe that the views of dry stock farmers were unfairly disadvantaged by their under representation on the CSG. Dry stock farmers occupy over half the pastoral land in the Waikato and Waipa catchments and yet had only one representative on the CSG as opposed to dairy having two representatives.

I attended most of the dry stock farmer meetings and believe the views expressed have not been taken into consideration by the CSG. For example dry stock farmers have showed vehement disapproval of grand parenting and yet this has been included in Plan Change 1, in fact many of their views were not been taken seriously.

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The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following table. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan, including Objectives, Policies, or other rules, or restructuring of the Plan, or parts thereof, to give effect to the relief sought.

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
	OPPOSE	REASON	RELIEF SOUGHT
<p>Provision</p> <p>Rule 3.11.5.3</p> <p>Permitted Activity Rule</p> <p>- Farming Activities with a Farm Environment Plan under a Certified Industry Scheme</p>	<p>I oppose</p>	<p>The reasons for this are:</p> <ol style="list-style-type: none"> 1. A Nitrogen Reference Point (NRP) will have perverse outcomes in farming and will not achieve a significant reduction in nitrogen leaching into waterways. 2. The nitrogen leaching on my dry stock farm is less than half that of the average Waikato Dairy farm and has been for many years. Under this rule the average dairy farmer will be able to continue farming at the same stocking rate and leaching nitrogen at the same rate , (more than twice that of the average dry stock farm)His farming behaviour regarding nitrogen 	<p>I seek that the provision is: Deleted in its entirety/</p> <p>As an alternative I propose</p> <ul style="list-style-type: none"> • Sub Catchment Approach <p>Farmers become responsible for improving water quality in the streams , lakes and waterways on their farms</p> <p>Comment: Dry stock farmers will make more progress with reducing other contaminants such as</p>

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		<p><i>leaching will not have to change under this Plan.</i></p> <p>3. <i>I have 65 ha earmarked for retirement. To fund the cost of this retirement and maintain present profitability, I would have to increase the stocking rate on the remaining land. This rule will prevent me from achieving this and as a result the land will not be retired.</i></p> <p>4. <i>Nitrogen leaching is not generally a problem associated with dry stock farming so why should this rule apply to us?</i></p>	<p>phosphorous and e coli if they are allowed to remain profitable and not be shackled by NRP</p> <ul style="list-style-type: none"> • Better Science <p>Better science to show the actual levels of contaminants individual farms are discharging</p>

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<p>The specific provisions my submission relates to are:</p>	<p>My submission is that:</p>		<p>The decision I would like the Waikato Regional Council to make is:</p>
<p>Provision "Full achievement of the Vision and Strategy will be intergenerational"</p>	<p>SUPPORT /</p> <p>I support with the following amendments.</p>	<p>REASON</p> <p>With regard to the following sentence: <i>" In addition , the current understanding is that achieving water quality restoration requires a considerable amount of land to be changed from land uses with moderate and high intensity of discharge to land use with lower discharges (eg through re forestation)"</i></p> <p>I believe we need to have the discussion now regarding the signaling of forced land use change.</p>	<p>RELIEF SOUGHT</p> <p>I seek that the provision is amended as set out below</p> <p>This discussion would include :</p> <ol style="list-style-type: none"> 1. Specific areas of land that may be forcibly retired in the future need to be identified to farmers now. Farmers need and deserve this information so that they can make sound investment in their business going forward. 2. Compensation to owners of land who are forced to either retire land or make significant land use changes to accommodate lower discharges. 3. Previous NZ governments actively encouraged farmers to break in large tracts of Waikato Hill Country. If this land is to be retired then the government has a

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			responsibility to recompense land owners. 4. Everyone in the community must share the cost of future changes in land use.

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	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
<p><i>Provision</i></p> <p>Rule 3.11.5.3</p> <p>With regards to</p> <p>Farm Environment Plans</p>	<p>I support/</p>	<p>The reasons for this are:</p> <p>I believe the whole Healthy Rivers process has heightened all farmers' awareness of their obligations as land owners to sustainable land use. The creation and implementation of Farm Environment Plans (FEP)is an important step along the way in encouraging farmers to voluntarily identify areas of mitigation that they can undertake on their individual farms.</p> <p>Farm Environment Plans also encourage farmers to think sustainably when planning and carrying out farming practices.</p> <p>FEP's should be revised at ten yearly intervals, or when there is a change in ownership.</p>	<p>I seek that the provision is: amended as set out below :</p> <p>Although I strongly support the use of FEP's I equally strongly oppose grand parenting in the form of Nitrogen Reference Points and propose an amendment to delete this provision from Rule 3.11.5.3 and any other rules in which it may appear</p>

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	SUPPORT /	REASON	RELIEF SOUGHT
<p><i>Provision</i></p> <p><i>Rule 3.11.5.3</i></p> <p>No. 3 Cattle , horses, deer and pigs are excluded from water bodies in conformance with Schedule C</p>	<p>I support/</p>	<p>The reasons for this are:</p> <p>I support the fact that sheep are not excluded from water bodies.</p> <ul style="list-style-type: none"> - Sheep do not stand in water - Sheep do not cause erosion of the banks of water bodies when they go there to drink - The farming of sheep needs to be encouraged as they cause far less environmental damage than the likes of cattle 	<p>I seek that the provision is:</p> <p>Retained as proposed</p>

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Yours sincerely

Malcolm Garland Harding



8/03/2017

Signature

Date