

**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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Hamilton East
Private bag 3038
Waikato Mail Centre
HAMILTON 3240

Complete the following

Commented [j1]:

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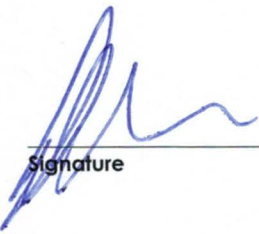
I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm.

Yes I wish to be heard in support of this submission.

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Signature

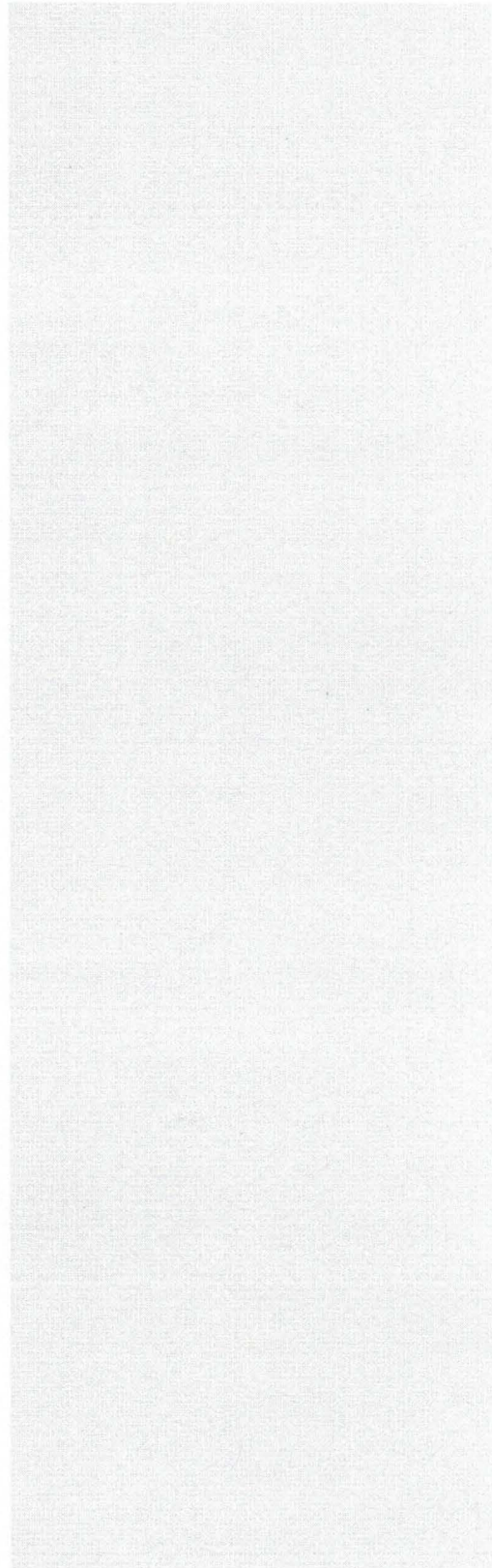
date



5/3/2017

Signature

date



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Introduction

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

Cranleigh Agri-Business Trust (Alan Henderson) are farming in the Paterangi/Pirongia area. Our enterprise covers an area of 350ha and has a number of sectors involved being Dairy Farming, Sheep/Beef farming,, Apple and Nashi Pear Horticulture unit, Commercial calf rearing and intensive cropping.

We have been arable farming for 55 years (cropping the same paddock for 55 yrs) on the same soils, managing to gain the highest yield in the Waikato for many years.

This can only be achieved by maintaining very healthy soils.

The dairy unit reusing the clean bore water four times before being irrigated to high yielding crops, fencing all water ways, using minimum tillage systems and not pugging our valuable top soil, we in our enterprise are well aware that looking after the environment not only maintains the profit of our business but also makes the business resilient for future generations.

I am particularly concerned about the following aspects of plan change 1.They will have implication on my property, my current farm business and the economic wellbeing of the Waikato region.

The significant negative effect on rural communities

The broad brush approach which doesn't differentiate between sub-catchments with low levels of environmental damage and those with high

The cost and practicality of implementing the rules

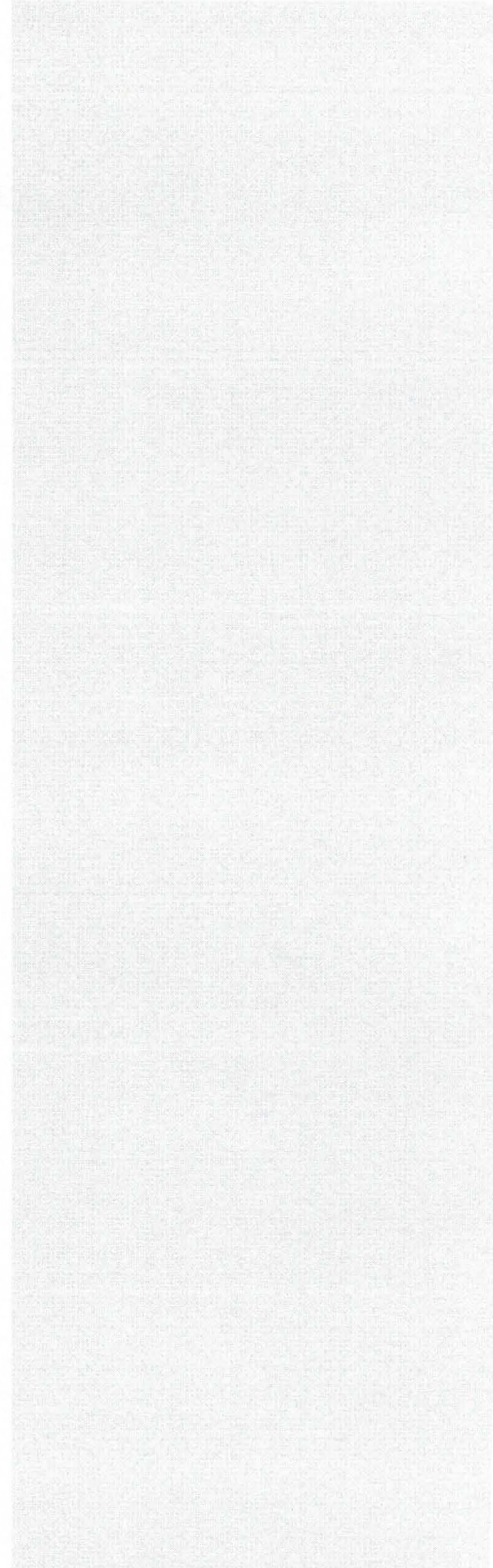
The rules around land change which will restrict the ability to take up market opportunities and restrict the region's economy

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The time frames for complying with the nitrogen reference point rules which are too short, given that overseer is still being developed for the cropping sector

The specificity of the rules around cultivation and set-back widths

I set out my concerns more specifically in the table below.

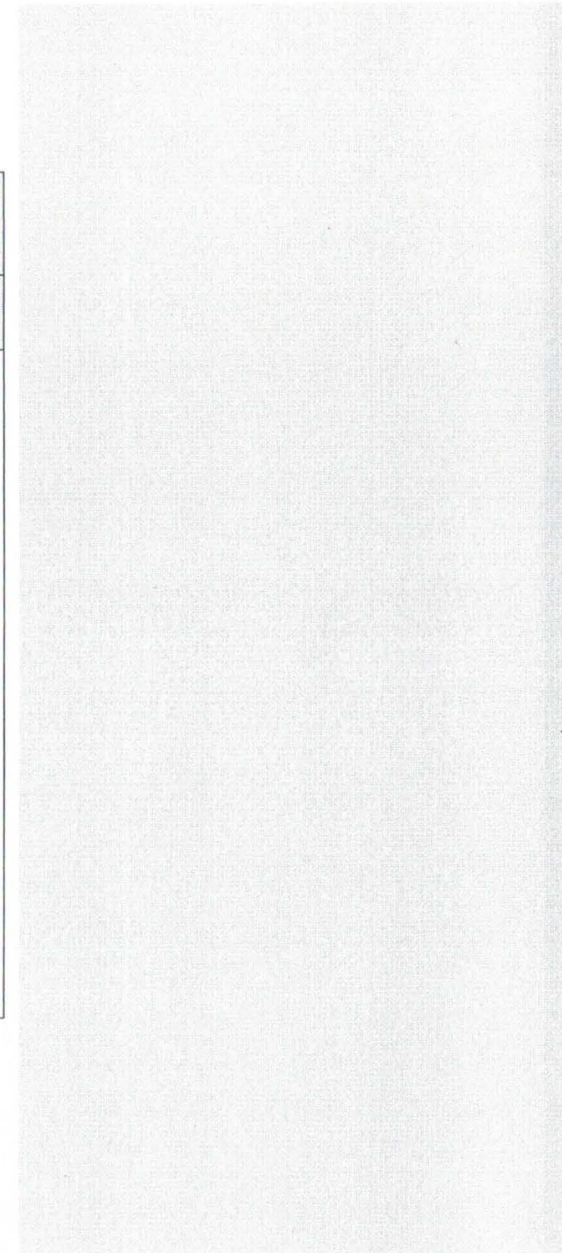


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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
Schedule 1 Farm Environment Plan	Support	<p>The reason for my support is that it sets the picture to where the property is today, and give the owner a means to think about the environmental factor on their property</p> <p>Farmers should be able to develop their own plans, either on there on own accord or as participants in a FED development workshop</p> <p>Time and education will be the best way forward</p>	<p>Give support and guidance and make the Farm Environment Plan a one page document.</p> <p>Time and education will be the best way forward</p>
Schedule 1 Point 2.(b)(iii), (F)(ii) d. Slope and set back zone for arable cropping	I oppose these rulings	<p>Depending on the type of cultivation used all sediment can be maintained , and research has shown that a 600mm buffer zone is all that is needed</p>	<p>Soil losses have a direct economic cost to the farm, however a rule preventing cultivation on slopes exceeding 15 degrees is impractical.</p> <p>The measurement of slope by farmers and consultants is difficult as slope is not consistent within the landscape. Within a paddock, slope will vary, and if the rule is to be upheld there will be parts of the paddock which will need to be left uncultivated.</p>

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			<p>Management problems:-</p> <p>Lost opportunity cost of land taken out of production</p> <p>The requirement to find alternative productive and efficient use of land</p> <p>On our farm the topography is flat so the width of setbacks is excessive given that the risk of sediment movement into the drain is low and the period for sediment losses between cultivation and significant crop cover was less than a month for spring and autumn sown crops.</p> <p>Research shows that 91% of incoming sediment through a grass filter was deposited in the first .6m.</p> <p>Cover cropping over arable areas on as many days of the year as possible</p>



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<p><i>Nitrogen and grand parenting approach.</i></p>	<p>I oppose these rulings</p>	<p>If you build up the carbon (i.e. organic matter) of the soil it will have the capacity to hold more water, Nitrogen and other healthy organism. I have proven this over the last 40 yrs. with the longest paddock growing maize in the Waikato and achieving the highest yield. All this without using a model.</p>	<p>If you build healthy soils, we should be able to increase the nitrogen in put depending on yield.</p>

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Schedule B Nitrogen Reference Point	I oppose	<p>I submit that the time frames for the development of NRPs for mixed arable systems is extended until the development work for the OVERSEER crop module is completed.</p> <p>I propose as a fairer approach, Waikato Regional Council develops sub-catchments based on scientific measurements and monitoring of contaminants levels within the sub catchment waterways.</p>	<p>Attempts to model cropping systems in Overseer often deliver error messages preventing the nutrient reports from running. A number of work arounds have been recommended by overseer LTD to manage these error messages. This moves the modelled data away from the actual farm data, in so doing reduces the level of confidence that the farmer has in the nutrient budget.</p> <p>As with my other points made, building healthy soils, will mean that a nitrogen reference point has little value</p>

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<p>Schedule 1 Point (F)(i)A description of cultivation management</p>	<p>Oppose</p>	<p>Points (e) and (F) do not apply to the risk associated with cultivation. I submit that these points are renumbered and removed from the cultivation clause.</p>	<p>Soil losses have a direct economic cost to our farm, however a rule preventing cultivation on slopes exceeding 15 dec is impractical because:</p> <p>Within a field slope will vary and if this rule is to be upheld there will be parts of the field which would need to be left uncultivated. This poses a number of costs and management problems.</p> <p>Opportunity cost</p> <p>Requirement to find alternative productive profitable land use</p>

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<p>Rule 3.11.5.7</p> <p><i>Non complying activity rule Land Use Change</i></p>	<p>Oppose</p>	<p>Remove this rule</p> <p>Replace it with a rule that enables land use change to occur with reference to established sub-catchment limits</p>	<p>It is too heavy handed to apply a land change rule to the whole region. A more flexible approach which acknowledges differences between sub catchments will prevent unnecessary cost and aggravation for both farmers and the council.</p> <p>Profitability will be constrained by the consent process and the economic resilience of the region will decrease</p> <p>AS land is leased and land use will change so it will be difficult to establish weather land use intensification has occurred.</p>

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Yours sincerely

Alan Henderson



Signature

5/3/2017

Date

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