

From: Robyn Harris
To: [Healthy Rivers](#)
Subject: Healthy Rivers Submission
Date: Tuesday, 7 March 2017 9:08:17 p.m.
Attachments: [Peter Harris PC1 Submission.doc](#)

Dear Sir/Madam

I send you the attached submission concerning PC1.

I have farmed in the Nth Waikato all my life, and served on the Waikato District Council for many years. The process and resulting regional plan is deeply concerning to me for the viability of our farms for the next generation, and the prosperity of our proud farming region. I look forward to speaking to my submission.

Please confirm your receipt of this submission

Yours sincerely

Peter Harris

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 SHEET	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

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 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
Emailed to	healthyrivers@waikatoregion.govt.nz <i>Please Note: Submissions received by email must contain full contact details. We also request you send us a signed original by post or courier.</i>
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 Peter John Harris		
Full address 56 Huhu Road, RD1, Huntly 3771		
Email robyn_mark@xtra.co.nz	Phone 078284640	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name Peter John Harris		
Address for service of person making submission: 56 Huhu Road, RD1, Huntly, 3771		
Email robyn_mark@gallagher.com	Phone 078284640	Fax

TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i>
<input type="checkbox"/> I could / <input checked="" type="checkbox"/> could not gain an advantage in trade competition through this submission.

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.)*

1) Requirement for N reference Point for All Farms

Policy 2 c. N reference point for all farms, and subsequently encompassed in Rule 3.11.5.2 item 4 b. , Rule 3.11.5.3 item 2., Rule 3.11.5.4 item 5. , Schedule B – N reference point, page 53 section 5 a) and 5 b)

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
- Oppose the above provisions

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.)*

I SEEK THE FOLLOWING DECISION BY COUNCIL

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

- Accept the above provision
- Accept the above provision with amendments as outlined below
- Decline the above provision
- If not declined, then amend the above provision as outlined below

Delete:

Policy 2 Item c, Policy 3 item c, 3.11.5.2 items 4 a) and b), 3.11.5.3 item 2, 3.11.5.4 item 5 first sentence and item 5 c, Schedule B in its entirety page 47, 5 a) and 5 b) on page 53

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.)*

Rule 3.11.5.7 Land Use Change, and Policy 16 development of Maori land

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

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- Support the above provisions
 Support the above provision with amendments
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1. Land Use change requiring consent will cripple farm succession and business viability

As outlined in the detail above concerning our own farm, it has changed substantially over the years. The farm has steadily grown by amalgamation with neighbouring blocks. We have also experimented with stock numbers, calving dates, feeding systems etc in an attempt to create a profitable business that is able to support the families (4) that rely on the farm. My wife and I have a 16 year old son and 2 daughters, one aged 13 and the other 18. We are trying to set the farm up so that at least one of our siblings have the opportunity to carry on the farming business following on from the 3 generations that precede them. This will require the farm to change and grow. However, with PC1 as it stands, any neighbouring dry stock land is very unlikely able to be appended onto the dairy farm.

Our run-off block presently in drystock needs to be merged with one of the neighbouring farms if it is to be anything other than a lifestyle block in the future. Rule 3.11.5.7 makes thus change difficult and costly if not impossible. The immediate effect is a loss of capital value, decreasing the land from \$25,000 to \$20,000/ha, this being the difference between dairy and intensive beef finishing land in our area. Across the 62 ha this is a loss of capital value exceeding \$300k.

2. Development of land no longer possible, even if the land is obviously suitable for the desired application

In policy 16 page 35, provisions are made for the development of maori owned land returned under treaty settlement and multiple owned maori land. I support this being possible, but not under the framework presented in PC1. My suggestion is that all land deemed suitable for a specific purpose be able to be developed without a resource consent, provided that development is made within the guidelines acceptable for that land use and land type.

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Amend as follows:

Preferred Alternative:

Modify 3.11.5.7 so that this restriction applies only until Dec 2018. At that point, the WRC will define land usage suitability across the catchment. Land within specific usage suitability areas may then be developed with a suitable Farm Environmental Plan without a resource consent. Land use change outside that permitted by the suitability definitions or outside of the FEP would require a resource consent. This suggestion means all land owners, including iwi groups, can improve the productivity of the land within limits.

Another alternative:

Another alternative that could alleviate the issues in our own situation, is to recognise dairy farm operation in the past that ceased prior to 2014/15 or 2015/6.
 In this way appending our runoff block (previously dairy) to a neighbouring dairy farm either by myself or one of those parties would not require a resource consent.

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
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Schedule 1- Requirements for Farm Environmental Plans

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
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FEPs need to be practical for farmers to produce and implement. PC1 calls for individual FEP's to be developed by certain dates. There is a lot of detail being asked for in these FEP's, some of which changes each year, e.g. cropping programmes. Each year many farmers use crops to provide summer or in some cases winter feed, often as part of a re-grassing programme. Re-grassing is an absolutely critical activity to maintain highly productive pastures. Pasture underpins the NZ animal production system. Cropping is critical for economic pasture renewal on land with slopes >15 degrees. The FEP requirements need some modification to enable practical cropping and re-grassing practices. My requests for change are listed below.

Page No	Reference	Support or Oppose	Decision Sought	Reason

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
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Schedule C- Stock Exclusion

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
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Fencing streams appears to be one of the main tools farmers have to make a difference to water quality. Where this process is practical and affordable, support this intent.

I am aware that on some extensive dry stock properties, the rules outlined in Schedule C uneconomic and likely not needed in the present form.

I support the Federated Farmers position on this matter.

In addition see my request below.

Page No	Reference	Support or Oppose	Decision Sought	Reason
50	4 (a)	Oppose	Delete the requirement for P1 areas to be implemented by 2023 and change this to 2026.	Why should some farmers be required to complete this work before others? These farmers are disadvantaged relative to others. Consistency of rules and fairness is important.

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

- 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.
 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 electronic means.*

Signature Peter Harris	Date 8 March 2017
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Personal information is used for the administration of the submission process and will be made public. All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal 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.

Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

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Emailed to	healthyrivers@waikatoregion.govt.nz <i>Please Note: Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.</i>
Online at	www.waikatoregion.govt.nz/healthyrivers
We need to receive your submission by 5pm, 8 March 2017.	

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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.)

- 1) The excessive bureaucratic cost inherent in the process leading to PC1 as it stands now
- 2) The Process leading to the acceptance of PC1 by WRC Council
- 3) Requirement for N reference Point for All Farms: Policy 2 Item c, Policy 3 item c, 3.11.5.2 items 4 a) and b), 3.11.5.3 item 2, 3.11.5.4 item 5 first sentence and item 5 c, Schedule B in its entirety page 47, 5 a) and 5 b) on page 53
- 4) The requirement for FEP's for all Farms: Schedule 1
- 5) The requirement for fencing of all waterways, even on extensive cattle and sheep properties: Schedule C

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- Support the above provisions
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MY SUBMISSION IS THAT

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(Please continue on separate sheet(s) if necessary)

- **The cost of the plan so far in excess of 14 million, is outrageous. This money could pay for a lot of fencing or be used to house a significant number of families.**
- **The process that saw PC1 voted in by the WRC Council – a casting vote on such an important issue smacks of arrogance. A good chairperson will always return to the drawing board and seek compromise. When you look at the casting of votes, those affected generally were against and those with no financial implications voted for. Some will say this is not a RMA issue however best practice process is part of the act and this leaves much to be desired.**
- **The RMA says consideration must be given to affordability and fairness and this has not happened with regard to the costs of the ongoing process and the resulting plans.**
- **Further issues of concern are; the nitrogen reference point limiting future farming activities and benefiting or limiting one farmer against his/her neighbour – specifically the requirements are inequitable, unnecessary and focused on 1 nutrient which I understand is the least important for water quality; the amount of fencing required will be a major issue in regard to affordability for some of our dry stock farms in the catchment; and the need for plans for every day farming activity introduces bureaucracy for unproven or validated outcomes. This is draconian indeed and gives the impression that WRC bureaucrats are running our farms, which is very much a sad state of affairs.**
- **As for swimming in the Waikato River, plenty of adults and children are doing so now.**

- This Plan is going to have enormous consequences for our rural communities if allowed to proceed in its present form.
- I am not against improvement to our waterways but the heavy handedness and excessive bureaucracy saddens me greatly.
- We need to ensure that as high a percentage as possible of the costs borne by farmers and the community to improve our rivers do just that. The costs of implementing PC1 and auditing/managing the results look like a whole new bureaucratic industry will be created before a length of fence is installed or a tree planted

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Delete: N Benchmarking in its entirety: Delete all the of the following: Policy 2 Item c, Policy 3 item c, 3.11.5.2 items 4 a) and b), 3.11.5.3 item 2, 3.11.5.4 item 5 first sentence and item 5 c, Schedule B in its entirety page 47, 5 a) and 5 b) on page 53

Modify: Schedule 1- Requirements for Farm Environmental Plans: Remove the need for these plans, or encourage industry groups to promote best practice farming instead. Farmers attending workshops on this could be exempted from needing to produce such plans.

Modify: Schedule C to apply for drains and streams and dams, only where the stocking rate exceeds a specified value per hectare

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- | | |
|---|---|
| <input type="checkbox"/> Yes, I have attached extra sheets. | <input checked="" type="checkbox"/> No, I have not attached extra sheets. |
|---|---|

SIGNATURE OF SUBMITTER

(or person authorised to sign on behalf of submitter)

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Signature Peter Harris



Date 8 March 2017

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