

**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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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.

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Signature _____ date 3/3/17


Signature _____ date 3/3/17

The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the attached document. The outcomes sought and the wording used are a suggestions 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.

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Introduction

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



Our names are Glen & Michelle Cooper we are sheep and beef farmers in the Waipa River Freshwater Management Unit - Mangapiko sub-catchment. Our family have been farming our 155ha property for 14 years, our farm is not only our livelihood, but also our home and our heritage.

Glen & I both grew up in the Kairangi district, these hills were our playground, The Maunga our mountain.

In 2003 we formed a farming company with Glen's parents and bought 155ha on Griggs Road, Roto-O-Rangi farming it in conjunction with the Cooper's home farm (201ha) until last year when that property was sold.

We take our role as caretakers of this property seriously and our aim is to farm sustainably. Over the years we have been farming our property we have moved away from using traditional fertilizer options, preferring to use products that feed the soil by adding minerals & microbial stimulants to hold the soil in balance & build humus and carbon providing valuable filtering of nutrients reducing leaching and wastage. We farm with optimal, rather than maximum stock units, thus further preserving our soil & waterways.

The MEIT Sanctuary Mountain makes up our eastern boundary and some of our water feeds directly from the mountain. We also have numerous gullies on our property all with bush remnants, springs, streams, drains & wetlands. These waterways feed into one main stony bottomed creek that runs down our boundary meandering in and out of our property, before leaving our farm to continue its journey to the Mangapiko Stream.

Although we fully support the intention of Proposed Plan Change 1 and believe that cleaning up our waterways is important for all New Zealanders, we seek amendments to be made to parts of the plan and therefore ask that the attached submission be considered.

Regards,

Glen & Michelle Cooper

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).

Nitrogen Reference Point - Policy 2 c & d; Rules 3.11.5.2, 3.11.5.3 & 3.11.5.4 plus all other Policies, Schedules & Rules that apply to Nitrogen Reference Points.

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).

Although we do not oppose the use of Nitrogen Reference Points to determine a farms current Nitrogen losses, and fully understand that Nitrogen leaching is a very real problem in our rivers & streams. We believe that intensive farming practices, heavy reliance on Nitrogen fertilizers and irrigation significantly contribute to this and nitrogen losses from these practices need to be addressed.

However farms, such as hill country sheep & beef properties, often already use practices that limit their nitrogen losses e.g through lower stocking rates; lower fertilizer application rates; and typically do not use Nitrogen fertilizers as a matter of course. Beef cattle also drink less water (beef cows are only eating and drinking enough to produce milk for 1 calf each, significantly less than a dairy cow) beef cattle produce less urine. Beef cattle also eat pastures that typically have more fibre and roughage than their Dairy counterparts who tend to eat more lush nitrate rich pasture, therefore their urine contains less nitrates. The larger volume of enriched urine from Dairy cattle enters the soil groundwater and eventually our waterways.

Restricting low input farms to a preset NRP could unfairly limit their ability to remain flexible. These farm types rely heavily on the ability to make changes to stocking rates & ratios to follow market trends to remain profitable and the ability to continue developing properties over time. It also fails to recognize existing on-farm investment to minimize environmental impacts, while rewarding high emitting land users.

Recommended Amendments:

- * The differences between beef & dairy cattle need to be recognized when calculating the NRP
- * Allow low impact farming flexibility around their NRP by allowing an increase from NRP to a set threshold.

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
- Decline the above provision
- If not declined, then amend the above provision as outlined

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).

Stock Exclusion - Policy 2e: Rules 3.11.5.3 & 3.11.5.4 plus all other Policies, Schedules & Rules that apply to 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
- 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).

We support the exclusion of Cattle, Horses, Deer & Pigs from waterways and appreciate that sheep have not been included in these exclusions. Sheep are smaller animals and tend to avoid standing in water, therefore are not as likely to cause damage and erosion to stream banks and directly contaminate the waterways. Also sheep are useful in controlling weeds when used to graze riparian margins.

We also appreciate that alternative mitigation measures other than fencing are able to be used on land with a slope of >25 degrees, but would like to see the use of "sheep only" areas to be specifically given as a mitigation option along with natural barriers.

We understand from reading the Fencing Waterways Infosheet - October 2016 that all properties with ANY cattle, horses, deer or pigs on them will need to fence the specified water bodies if there is no natural stockproof barrier. We would like assurance that if we (for example) have a large paddock with a waterway running through it, we will not have to fence that waterway if that part of our farm is designated in our Farm Environment Plan as being "Sheep Only" even if we run cattle or have stock horses on other areas of our farm.

We would also like to see Plan Change 1 follow the Ministry of Environment's Clean Water recommendations for stock exclusion on rolling and steep land only applying to waterways over 1 metre wide at any point.

Recommended Amendments:

*Add designated "Sheep Only" areas to the mitigation measures available to be used on land with a slope of >25 degrees.

*Stock exclusion on land over 3 degrees slope (rolling or steep) to apply only to waterways permanently flowing where active channel is over 1 metre wide at any point.

I SEEK THE FOLLOWING DECISION BY COUNCIL

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

- Accept the above provision
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- If not declined, then amend the above provision as outlined

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).

Permitted Activity Rule - Other Farming Activities - Rule 3.11.5.2

- 4) b) The diffuse discharge of nitrogen from the property or enterprise does not exceed either: i) NRP; or ii) 15kg/ha/yr whichever is lesser...

and

- 4) c) No part of the property or enterprise over 15 degree slope is cultivated or grazed;

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).

We believe that a property over 20ha with a diffuse discharge of nitrogen of < or = to 15kg/ha/year is a property that is not being farmed intensively, most likely with low stock units per ha and limited fertilizer applied. Therefore we believe that grazing slopes of greater than 15 degrees would not significantly add to the amounts of nitrogen, phosphorus, sediment or microbial pathogens in the waterways. Especially if the animals grazing these slopes were sheep.

We see no reason why Rule 3.11.5.2 - 4) b) could not be amended so that the diffuse discharge of nitrogen does not exceed 15kg/ha/yr rather than limiting already low Nitrogen emitters, to an even more restrictive NRP that may severely limit their ability to be flexible and follow market fluctuations to remain profitable.

By either removing the word "grazed" from Rule 3.11.5.2 - 4) c) thus allowing slopes greater than 15 degrees to be grazed. Or by stipulating that the grazing only applies to Cattle, Horses, Deer & Pigs (which would be in line with the rest of the plan which doesn't include sheep in the exclusion to waterways) thereby allowing low input, hill country, sheep & beef farms to come under this rule to be a permitted activity without having the added expense of belonging to an Certified Industry Scheme or becoming a controlled activity.

Recommended Amendments:

- * Remove "either: i) NRP; or" and "whichever is lesser" from 3.11.5.3 subsection 4) b)
- * Either remove the word "grazed" from Rule 3.11.5.3 subsection 4) c); or
add - grazed by Cattle, Horses, Deer or Pigs to Rule Rule 3.11.5.3 subsection 4) c)

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
- Decline the above provision
- If not declined, then amend the above provision as outlined