

BEFORE THE

Waikato Regional Council

IN THE MATTER OF

**Healthy Rivers Wai Ora
Plan Change 1 and
Variation 1A**

Statement of Evidence of Martin Lindsay Wallace

[Submitter ID: 72975]

Dated 19 MARCH 2019

Introduction

1. My name is Martin Lindsay Wallace and I am a farmer at Motumaoho between Hamilton and Morrinsville where I farm 114 hectares.
2. I farm predominantly sheep, producing fat lambs, steers and heifers for export and local trade.
3. The farm has some flats and is otherwise rolling with some steeper hills, and is of predominantly Hamilton clay soils.

My Submission

4. I am assuming that Block 1, in dealing with overall Plan issues, is the forum to highlight my submission points in relation to the Objectives in the proposed plan and that hearing on the policies and rules will follow in subsequent hearing blocks.
5. In general I considered that the plan does not promote sustainable management in that some of the provisions are unfair in that they seem in the initial period to reward historic poor practice through the grandparenting rules for N leaching reductions and in turn penalise low leaching land uses and early adopters of mitigation and good practices. In addition, there is inevitably a problem in setting in place provisions that require major new investments such as stock exclusion, when in the more extensively farmed properties, commonly the sheep and beef farms, subsequent plan changes may render responses such as fencing to become redundant when more rigorous rules come into force. In my submission it would therefore be sensible to set some of the principles of how to approach the setting of policies and rules by making clear objectives to steer an equitable course.
6. For example: In 3.11-2 Objectives

Objective 4: People and community resilience

A staged approach to change enables people and communities to undertake adaptive management to continue to provide for their social, economic and cultural wellbeing in the short term while:

- a) considering the values and uses when taking action to achieve the attribute targets for the Waikato and Waipa Rivers in Table 3.11-1 and*
- b) recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed to meet Objective 1.*

7. My suggestion here is that the objective should recognise the potential inequity of impeding development of land that is currently underdeveloped compared say, to its land use capability, and which may have potential to be further developed with a still low environmental footprint within sustainable limits.

8. I consider this objective be amended by adding a new a) that gives priority to fairness or equity in formulating the staged approach with attention focussed on the activities with the highest levels of effect on the water quality. The existing subclause a) would become b) and be subservient to the new a). The original subclause b) would become c) and I suggest a new subclause d) that would read something like:

d) ensuring new impediments to the flexibility of the use of land with low level discharges and effects are minimised.

9. Objective 4 would then read like the following, or words to that effect:

Objective 4: People and community resilience

A staged approach to change enables people and communities to undertake adaptive management to continue to provide for their social, economic and cultural wellbeing in the short term while:

a) giving priority to equity in formulating the staged approach with priority attention on the activities with the greatest levels of effect on water quality;

b) considering the values and uses when taking action to achieve the attribute targets for the Waikato and Waipa Rivers in Table 3.11-1;

c) recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed to meet Objective 1.; and

d) ensuring that new impediments to the flexibility of the use of land with

low level discharges and effects are minimised

- 10.** In a similar vein, I submitted that a new Objective to follow Objective 4 should be developed that requires property level allocation of discharges, prescribing that grandparenting or similar such allocation methods will not be used, and which fairly relates to the assimilative capacity of the land, water and attributes, and not to historical practice. This may be developed as a Land Use Capability method. This is referenced in Footnote 5 on page 32 of the plan but in my submission this should be brought into this plan as a firm objective.
- 11.** The key is to include an objective that precludes grandparenting and similar, unfair methods and that drives the present and future direction of the policies and methods to a fair and land-attribute based system.
- 12.** Further, I have sought consequential amendments to the explanations and subsequent parts of my submission carried these objectives through to require modification of explanations and new or amended policies and methods.
- 13.** My submission includes proposed modification to some of the other objectives percentage and to increase the rate of improvement target for the first period on account of it being the relatively easy end of the full process to achieve the Vision. As I said, the above objectives are raised by way of example and not because the other submissions deserve less attention.