



Waikato Regional Healthy Rivers Plan Change 1 Submission Hearing Statement

Greenhaven Farms Ltd

Submitter Richard Kay

My name is Richard Alan Kay.

Greenhaven Farms Ltd is the family owned entity that owns and operates the farms in the North Waikato.

The cover photo is a view looking south from the grazing farm over the lower, arable cropped part of the property.

The farming operation, which has a total area of 275Ha, is situated 13kms east of Ohinewai on the Ohinewai-Tahuna Road near the locality of Te Hoe.

I have farmed the property for 32 years after attending Massey University to gain a Diploma in Agriculture. My partner Paula and myself have raised 3 children while living on and farming the farms.

The property has been in my family for two previous generations since 1939.

Soil types consist mainly of a course red clay on the rolling hill country (80Ha) and the remaining area (195Ha) is a fibrous sedge peat which is of a considerable depth.

Over the past 22 years I have developed over 100Ha's of the virgin peat into a productive arable operation. This area has still to reach its full productive potential and this is a concern which has encouraged me to submit on this plan change.

The use of a Nitrogen reference Point as referenced in Policies 2 & 3, Objective 3.11.4.11, Rules 3.11.5.2, 3.11.5.3, 3.11.5.4, 3.11.5.5 & supporting notes.

This includes the use of Overseer as the determining tool where this is included in the plan.

We don't support the Grandparenting of the NRP as a defining standard for locking in a farms ability to be economic and productive.

Concerns are and not restricted to;

The restrictions to a farms ability to be flexible with farm policy and management decisions that would enable an enterprise to meet changing market conditions.

It looks like an assumption was made that all farms are at or near maximum production capability, are mostly single farm production types and that those that are not are most probably hill country properties which would be best used as offset areas.

Low emitters will be penalised disproportionately.

As the property is in a traditionally dairy area and was considered ripe for a dairy conversion, I am disappointed that my decision not to convert over the years is still going to penalise us. I have practised a low input farming system for 18 years and know that to cut back anymore is going to be extremely difficult.

Doesn't easily take into account mitigation measures applied to various soil types.

We don't support Overseer as the tool to be used as a large portion of our property is a very deep (12m+) organic peat and Overseer and other nitrogen programs are notoriously inaccurate.

Waterways, Stock Exclusion and Cultivation Setbacks: Rules 3.11.5.2, Item 4.e.i & ii. 3.11.5.3, Items 3,4,5,6. 3.11.5.4, Schedule C.

Support in Principle.

Regarding stock exclusion from waterways and cultivation near waterways.

In general, we support the exclusion of stock from waterways on land up to a gradient of 15 degrees as per the national recommendation.

- i. We seek clarification about the definitions in Schedule C (Water bodies).
- ii. Who determines the presence of 'continual' surface water, as a wet period in the typically dry months could coincide with an inspection?
- iii. Is there a specific size as to what is defined as a wetland? As ours and many other properties have seepage areas which are wet areas for most of the year but are not a large area. (3-4 square metres)

Is a mechanically constructed pond, referred to as a constructed wetland?

Is the proposed 5 metre exclusion for cultivation and 3 metres for livestock only to make it come under the permitted activity rule?

Is there a proposed distance for cultivation exclusion for Items 3 to 6?

- Picture shows a 2 metre setback for tree planting and stock exclusion and a 1 metre setback on the righthand side of the drain.
- This has worked well for many years.



3 metre uncultivated setback between markers.
Lots of weed growth.



5 metre uncultivated setback between left and
right markers. 1 metre setback on opposite side.



Implementation Methods 3.11.4.4. Item d.

This is specifically in regard to the pest fish in the Lower Waikato waterways.

Has there been work done that has investigated the effect of the Koi Carp and Catfish on their effect regarding the E. coli and Nitrate concentrations in the waterways?

How much are they contributing to the elevated Nitrate levels and to the E. coli concentration?

There is more degradation of the waterways done by the concentrated numbers of these fish than has been allowed for in the current plan and I would like to see that this is recognised and accepted into the plan.

We support the continued control efforts of the pest fish but want to see more recognition of their degradation effects in the plan.

What is proposed for agriculture in the plan may not have as much effect as hoped for without a full understanding of what these fish are responsible for.

Schedule B addendum to Rules 3.11.5. g. i, iii, iv.

I do not agree to invoices having to be presented as normally a stock reconciliation would suffice along with fertiliser nutrient records as provided by the fertiliser companies and farm records of supplements traded.

Remove or amend with, Only required in extenuous circumstances; or something comparable.

Implementation Methods; 3.11.4.5

We support a sub catchment scale plan approach as this will enable the cause and effect to be more specifically understood, attributed to and owned by the landholders in a specific catchment.

Emphasis should be put on enabling this to be enacted as a way to mitigate contaminants.

Policy 16; Including Policy 7 in part.

Is this Policy (16) restricted to currently Maori owned land and more specifically, only land obtained at the time of the Treaty settlement. Some of this land has subsequently been sold and other land purchased.

I have read where Policy (7: b) does make reference to suitability of land type for the intended use as this was another concern.

As this Plan Change 1 is about Healthy Waterways it is a concern to see a Policy that is effectively about giving a sector of the community a commercial advantage based on race.

A definite determination of what land is included for the purpose of having Policies 7 and 16 should be stated clearly.

Thank you for the opportunity to present my submission.