

Submission: Waikato Regional Council's Proposed Healthy Rivers/Wai Ora Plan Change 1 (PC1)

Submission on a publicly notified proposed Regional Plan prepared under the Resource Management Act 1991.

Submitting On: The Waikato Regional Council's Proposed Healthy Rivers/Wai Ora Plan Change 1 (PC1)

Submitting To: Waikato Regional Council
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Date:	5 March 2017
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Submission

1. We have reviewed Waikato Regional Council's Proposed Healthy Rivers/Wai Ora Plan Change 1 (PC1) and **oppose** the Plan Change in its current form.
2. We wish to be heard in support of this submission.

We are 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.

This submission comes from Neil and Christine Goodin of Homestead Oaks Ltd, a 131ha dairy farm in Waerenga, sub-catchment area 12.

Our family is the fourth generation to productively develop this property for 139 years, and is a registered NZ Century Farm.

We milk 330 crossbred dairy cows at peak milk, using a pastoral grass-based, low to moderate inputs, production system. The land is heavy clay, prone to winter wet and summer drought. The Waerenga Stream runs through or bounds our property which has some stop-banks and is fully fenced for stock exclusion. We are currently installing riparian strips. The land is low lying and therefore prone to flooding and back-flooding in heavy weather conditions. The topography of the land and local climate mean that we carefully manage our property to ensure a sustainable business.

The best improvement we could make to our farm to ensure it remains sustainable for future generations would be to grow it by 50ha to make it more efficient labour to cows ratio and/or to intensify with more cows per hectare.

We support the intent of the Plan to improve and maintain water quality, but oppose some of the reasoning, methodology and structure of the plan:-

General

Query the value and validity of existing scientific data. Has not been communicated in a meaningful, honest manner to stakeholders.

Remove flood/high flow conditions from water quality target data because this skews and confuses the outcome and interim targets.

Ensure all contaminants are addressed eg koi carp, hydro dams, point source discharge. The current proposal is unreasonably targeted at farmers when other users and contaminant contributors should be held equally responsible for improvements and associated costs.

Worst offenders in whole region should be targeted first rather than the worst in each catchment. However maintain sub-catchment focus to recognise that areas unique challenges that may affect individual business performance.

All contributors should have an Environment Plan to tailor mitigation – for farms use Farm Environment Plans.

Responsibility – we question if the business owner should hold total liability when the business operator has significant impact upon outcomes.

Eg PC1 specifies farm owner is responsible. There will be costs for farm businesses to amend existing agreements between parties and for liability insurance to protect against operator errors.

Eg Short land leases are common arrangements where the lessee controls the land.

Compliance and mitigation costs have been undervalued - financial impacts will lead to undue pressure on operators, businesses and communities.

Signals that further change may be required in future creates uncertainty, limiting businesses from planning and operating to their optimum.

Farms

Point source discharges can stage future mitigations to spread innovation costs over time to allow for a return in investment. This is not the case for me as a land owner.

We oppose the use of the Nitrogen Reference Point (NRP) because this was designed as a monitoring tool and is now to be used as a regulatory tool. We question whether this tool is Adequate, Reliable and Fair based on the known variability of the NRP and the significance of contaminants other than Nitrogen on water quality.

Farms with high NRP are likely to be intensively farmed. They benefit because they retain flexibility in how they farm to maintain or reduce their NRP, unless they are over the 75 percentile. Farms such as ours which has a low NRP has less opportunity to alter our production system. Farms with high NRP's will be more appealing and potentially valued higher than farms with a low NRP.

Oppose mandatory fencing in areas where slopes are over 15°.

- Require clarification on how slope is measured given the ranges of topography experienced within each paddock and adjoining watercourses
- Fencing steep land stocked at low intensity is financially disabling for most affected farmers who have the least alternatives available to recover fencing costs. The process of building the fences adds to sediment contamination and should be minimised.

Support stock exclusion, however only where it is practical to do so, and is relative to water quality benefit gains. Allow alternatives such as provision of reticulated water rather than fencing markedly reduces the amount of contamination to waterways.

Cultivation limitations are too severe and do not allow for reasonable alternatives. We oppose the 5m setback and 4ha limit. FEP's should include identification of risk areas and specify the setback appropriate taking into account factors such as slope, depth of cultivation, soil porosity and fertiliser inputs. 10% of farm land is a common area under cultivation annually for crops and re-grassing.

Land Use Change rules

- Value of properties will change markedly and impacts most significantly on those least able to take counter measures eg grazier might have intended to revert or convert to higher impact operation but is unable to do so now and his land value has decreased.
- Lack of flexibility limits ability to react to market demands/changes which is key to running a sustainable business operation
- Impacts on continued financial viability and sustainability – compliance costs plus inability to adapt mean less income.

Impacts on society especially small rural communities have been underestimated – conduct more intensive exploration.



Signed
N D Goodin

Date

8/3/2017



Signed
C M Goodin

Date

8/3/2017