

Submission Hearing

1

Thank you for this opportunity to speak to our submission. I offer an apology from Tom, he is on his run of night shifts.

Tom and I appreciate that you have taken time to consider our opinion, and implemented some of the changes we have suggested.

Today I wish to briefly cover two of the major components of the Southland Water and Land plan. Freshwater and physiographic zones.

But first a little of our background.

Tom and I own a 70ha farming property at Bronxholme. We are the third generation of my family on this property, following my father, and grandfather, who purchased the property in 1932. The property has been farmed intensively throughout these past 85 years: Including dairying (as per photo 1), sheep and beef, intensive cropping of wheat and barley, back to sheep and deer, and currently has 25% in potatoes and 75% leased to dairy support.

Historically properties of our size were able to support a family. Southland was dotted with milk and cheese factories, but like our family many have had to adapt, change modes of production and practice to continue to provide a relevant income.

Tom and myself both work off farm to supplement our income, we have three married children and three grandchildren living in Mt Maunganui.

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Tom & Wendy Holder

Date Received: 14/10 /17

1) To Address the water component of the plan.

We are all aware of the life sustaining nature of freshwater. What I noticed as I waded through 706 pages of The 42A report, was how many businesses, companies, and individuals were vying for their rights to freshwater. To keep existing water consents, to attain water for their use, and to maintain the value of freshwater.

The water ad hoc plan in its current form discriminates between those who have water consents, and those who may wish to attain water consents in the future. This inequity is divisive, and indeed will alter values of properties, and their production capabilities. Ultimately the ability of some farmers to maintain a relevant income, and eventually the economic well being of Southland, in a farming capacity, will be affected.

Disparity already exists. An example from a personal point of view. Please see photo (2) - This is our domestic water supply (on a good day) at Te Anau, for which we pay \$455-77/year. Please see photo (3) - This is a farm on The Bransholme straight wasting water for which they pay nothing. And a potential future example of what we will see.

FARM A - 200 ha.

- ⇒ water consent 180,000L/day
- ⇒ higher production = more income
- ⇒ higher farm land value.

the neighbouring property is

FARM B - 200 ha.

- ⇒ unable to get water consent - allocation full.
- ⇒ lower productivity = less income
- ⇒ lower farm land value.

To value water, water has to be given a value.

In our submission we suggested E.S. see that "water is allocated equally and consistently to all in Southland, for their reasonable and efficient use"

We suggested water should be metered and charged for at a per litre rate. We first suggested this at the draft

Water and land plan hearings. We haven't seen any evidence that this has been adequately researched and assessed by E.S.

In response to our submission, the H2A report suggests that there are legislative reasons E.S. is unable to charge for water, citing section 14(3)(b) of the RMA as the reason.

Section 14(3)(b) states

"a person is not prohibited from taking water if -
in the case of freshwater, the water is required to be taken or used for

- (i) an individual's reasonable domestic needs, or
- (ii) the reasonable needs of a person's animals for drinking water.

and that the taking or use does not, or is not likely to, have an adverse effect on the environment"

Reasonable needs being defined as

- ⇒ 2000L per day per dwelling
- and ⇒ 250L per ha of land.

We don't understand the legislative reasons!

* Mr McCallum stated at the draft water and land plan hearing that, water takes/consents are metered already. How hard would it be to calculate the water take charge of a land holdings reasonable needs, and charge for water over and above this level.

Or allocate this amount of water (for reasonable needs + 250L per ha) to each land holding, and those that require more could trade within the FMA, similar to the NZ Emissions Trading Scheme.

⇒ Auckland rate payers pay per litre for freshwater into their dwelling and pay per litre again for wastewater going out.

⇒ Mt Manganui rate payers also pay per litre of fresh water into their dwellings.

This approach gives accountability to the consumer.

In the guide to Section 32 of the RMA, it states the councils are to identify a variety of response options. One of the examples given is quote.

"the provisions or methods used by other local authorities to manage the same issue".

If water rates were payable per litre used, in Southland, it would bring every Southlander under a fair and equal umbrella.

Politicians are now bringing water charges to our attention as a way forward, they are recognising the need to protect our freshwater resource.

Let E.S. not be found behind the eight ball again this time, let this be your watershed moment.

2. To address the Physiographic Zones.

We raise the issue of physiographic zones, as we don't believe the methodology has been proven, and the zones themselves are a sweeping generalisation of soil types within Southland. Also we see E.S. itself has written exemptions to the rules.

Our own property at Brimholme is classified to be in the oxidising and gleyed zones

⇒ we have no tile drains

⇒ we have the Tomaparakan Creek running directly through our property. The creek has been fenced or partially planted as per an E.S. plan - 25 years ago.

⇒ we have no risk of flooding.

If you look at the map (4) you will see our property is opposite the new dairy hub, which is also classified in the oxidising and gleyed zones and bordered by the Makarewa River.

In the proposed water and land plan Policy 16 (1)(a)+(b) it strongly discourages any new, or further intensification of dairy farming. And Rules 22 + 23 put restrictions on land use. Yet the Dairy Hub was exempt of these rules as in clause (g) of both 22 + 23.

We find E.S. exemptions for the Dairy Hub to be hypocritical.

The point we wish to make is:

Either $\Rightarrow$ Environment Southland sees fit to make exemptions to the rules, and is biased. Which would indicate their priority may not be to protect the environment, but to satisfy the legislative requirements of the RMA.

OR $\Rightarrow$ The methodology behind physiographic zones is unproven, and E.S. honestly believes that, to not adhere to the rules, is not going to cause any further deterioration in Southland's water quality.

Either way it would be good to receive their explanation as to which is actual. Southland rate payers expect that E.S. is there to protect the environment.

We understand the author of the 42A report has recommended the removal of exemption clauses for the Dairy Hub. But this doesn't remove the intent.

In Summary.

From this Southland water and land plan, and the 42A Report, it is clear that those who currently have water and discharge consents are the "haves" The rest of us are the "have nots" And rules around physiographic zones will restrict farm productivity going forward, affecting land values.

To Quote Gary Garner on real estate matters.

"On the basis that land value is closely linked to its productive capacity, the value of land is also potentially affected, since management systems

and farm inputs are constrained"

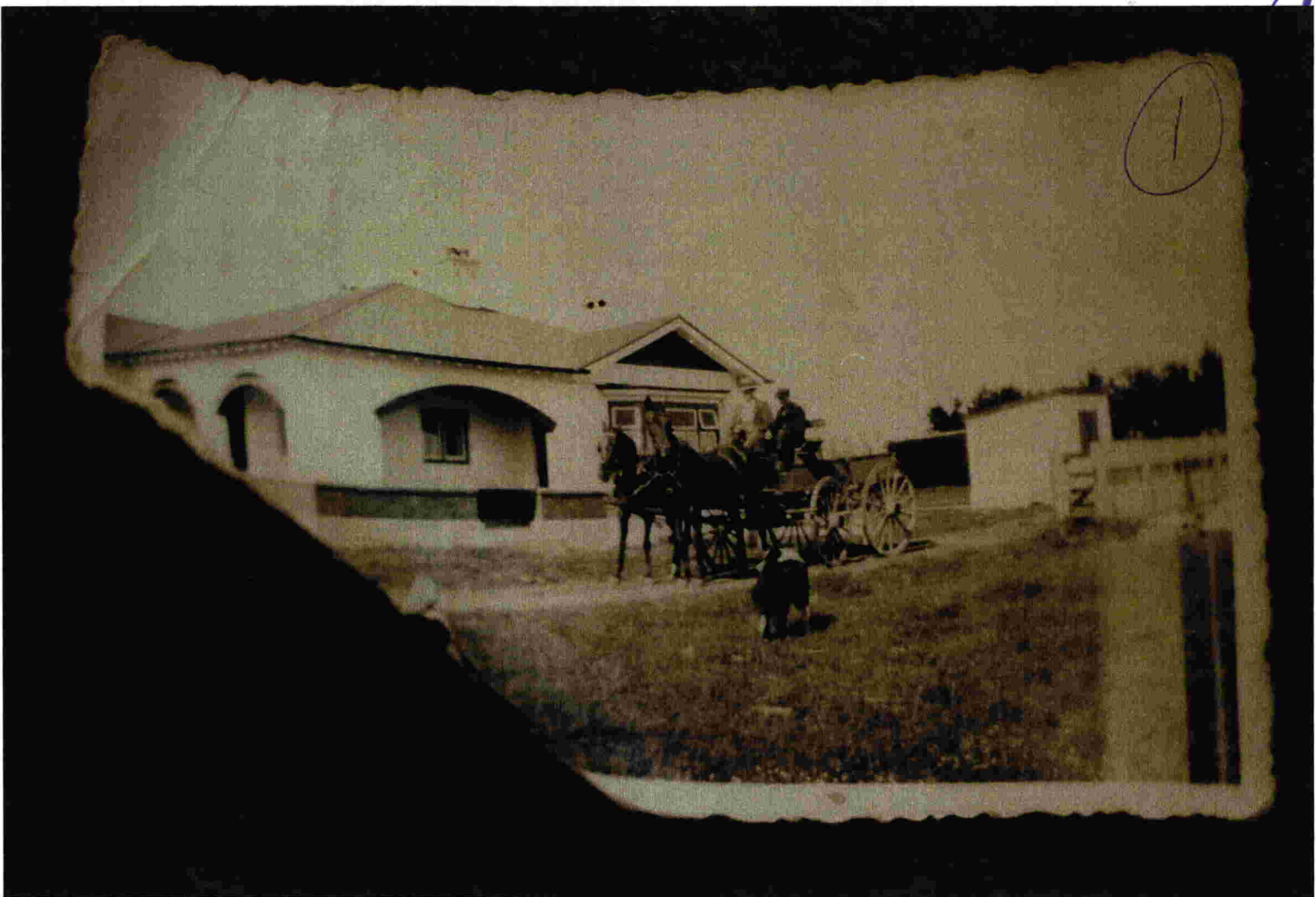
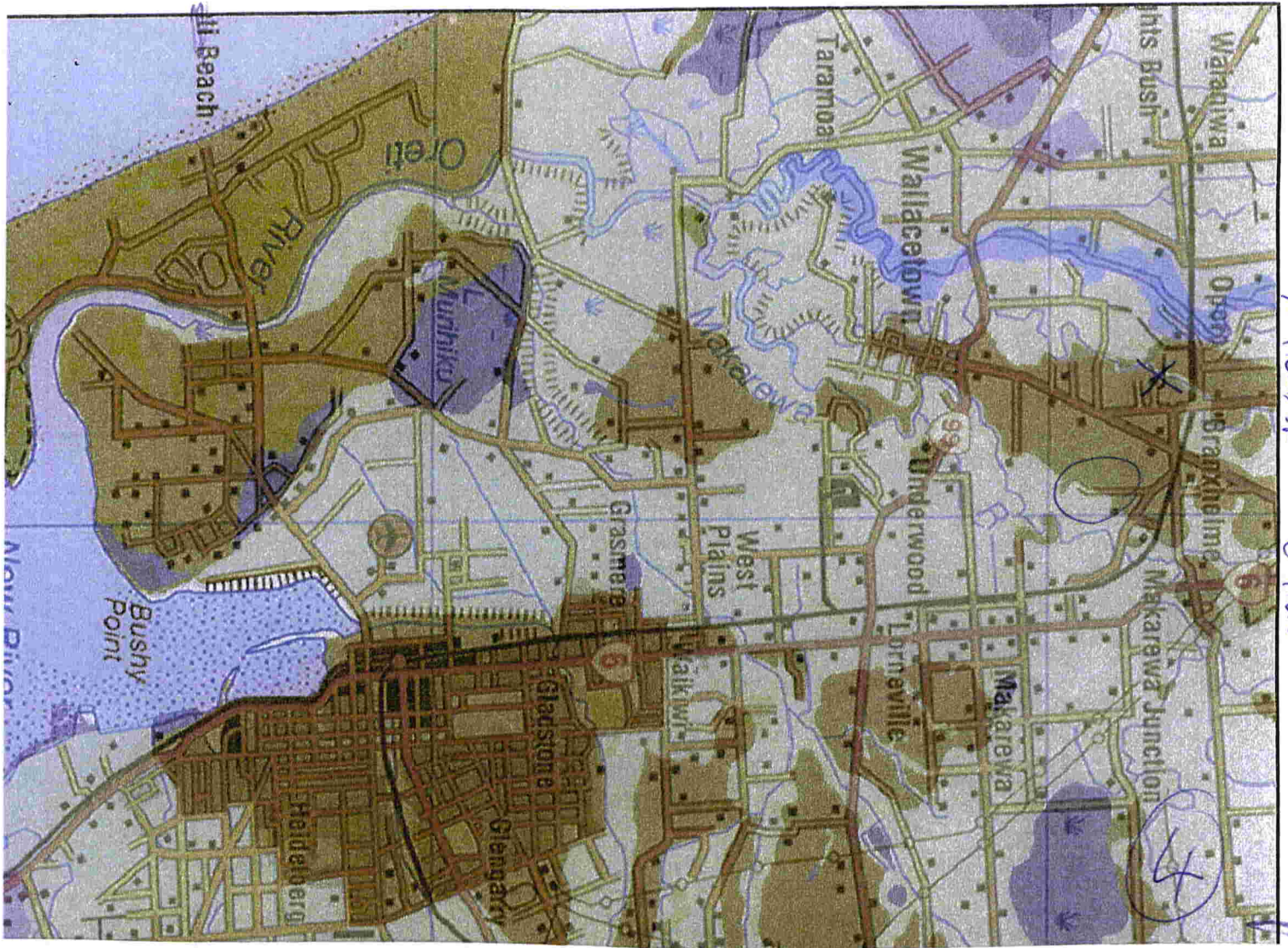
"More over, farms are typically bought and sold on the basis of their perceived productive capacity, since profitability is a reflection of productivity. Some commentators have suggested that farmland values could be reduced significantly"

Maybe E.S. can understand the rising stress levels within the farming community. Not only is the farmers livelihood affected, but also their retirement fund. And the irony of it is most of these farmers have not been the major contributors to the freshwater decline.

Finally:

As Mr McCallum is in the catagory of having consents we suggest his position on the hearing committee appears a conflict of interest.

Thank-you for your time.



2



Maximum water flow Te Anau property for which pay full water rate to SDC

3



Water wastage (query whether dairy effluent) on Clear Sky Dairy farm Saturday 12th June 2015.

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