Submission on proposed Southland Water and Land Plan

Email your completed submission to policy@es.govt.nz by 5.00pm Monday 1st August 2016

Alternatively, you can post your signed submission to:
Southland Water and Land Plan
Environment Southland
Private Bag 90116
Invercargill 9840

You can also deliver your submission to Environment Southland’s North Road office or fax it on 03 211 5252.

Full Name: Neil & Shareyl Bradt
Organisation*: Neil & Say Bradt

* the organisation that this submission is made on behalf of

Postal Address: 1403 Otapa Valley Road, Wrenn
RO 1, Gore.

Phone (Hm): 03 2025439
Phone (Wk): 027 6401200
Phone (Cell): 027 6401044
Postcode: 9177
Fax: (03) 2025439

Email: valleyhill@xpress.com.nz

Contact name and postal address for service of person making submission (if different from above):

Public hearing
Please choose one of the following options:
☐ I do not wish to be heard in support of my submission; or
☐ I wish to be heard in support of my submission; and if so,
☒ I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

Trade Competition
If you could gain an advantage in trade competition, your submission must only include matters which affect the environment.

Please tick the sentence that applies to you:
☒ I could not gain an advantage in trade competition through this submission; or
☐ I could gain an advantage in trade competition through this submission.

If you have ticked this box please sign below to declare that you are directly impacted by an adverse environmental effect.

Signature: Date: 26-7-16

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:
(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

Form 5: Submissions on a Publicly Notified Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991
Rule 23

Intensive Winter Grazing

We do not support this rule 23 which reads that we would require a consent to crop more than 50ha, regardless of the total property area. Being able to winter our own stock is crucial to our farming operation. We do not graze excess stock in the winter, we solely wish to feed our own stock to the best of our ability. As our property is 1664ha the proposed 50ha will not feed our stock.

We feel that restricting the area available for intensive winter grazing will result in higher yielding crops being planted which is going to have a more detrimental effect on the environment.

Because of the higher altitude of our properties we cannot get the yields of those grown on the lower altitude country so therefore have to put in more area of crop.

There are also high costs associated with consents and feel this will have a flow on effect to the Southern economy.

Proposal

We propose that intensive winter grazing be a percentage based on total land holding.

Rule 25

Cultivation on Sloping Ground

We oppose that a consent be required for sloping ground. Unfortunately not all farms are flat, with consents being required and larger setbacks being imposed this is going to have a huge burden to farmers with rolling land and not only in a financial sense. Those on hill country are often very limited to the flat areas they can work.

With larger setbacks farmers will need to grow higher yielding crops as they have a decreased productive area.

Feel us paying to have a consent to work ground is not going to help the environment. The continual cost of compliance is also going to impact significantly on the community.

Proposal
We propose that Rule 25 be removed from the plan.

**Recommendation**

Instead of taking a one shoe fits all attitude, Environment Southland should identify the problem farms/farm practices and educate these farmers/farms to minimise damage and not assume that every farm/farmer is causing environmental damage.

Bringing in a consents based farming system is going to add a huge burden and stress to farmers who are already under many pressures. The vast majority of farmers farm to the best of their ability often dealing with very challenging financial and environmental conditions. Also wish to express concern at the cost of compliance costs farmers will face for no real benefit, this will certainly have a flow on effect to rural Southland.

Regarding the physiographic zones-how have these been determined, it appears in a number of areas that the areas are divided by roads, this appears very strange. Does Environment Southland have any scientific proof that certain farming practices on certain physiographic zones causes more damage than on other zones.

It would appear that the Land and Water Plan is being jumped into and all farmers are being grouped as one with no regard for the size of their land holding or their farming practices.