Submissions
Environment Southland

Via email to policy@es.govt.nz
1 August 2016

Proposed Southland Water and Land Plan submission

Thank you for the opportunity to comment on the Proposed Southland Water and Land Plan.

Environment Southland is required to maintain and improve water quality under the NPS-FM and implement limits to protect water quality. I along with many farmers and other constituents also agree with the need for that to happen.

Environment Southland undertook considerable consultation during 2015 in the development of this Plan. I applaud Council for the manner in which they considered public input and adapted the Plan based on the feedback received. This Proposed Plan is a significant improvement on the draft Plan from 2015.

I support Council’s intention to “hold the line” on water quality from now until the limit setting process to ensure that the province is working towards limit setting and minimise the challenges associated with that process.

However I do not support elements of this Plan which go beyond “holding the line” and impose regulation which will have a significant economic impact on the region. I believe these steps are premature as findings from the, as yet incomplete, Southland Economics Project are vital to ensure that water quality outcomes are balanced with the economic health of the region. Restrictive regulation must wait until this information is available, particularly as there is solid research supporting the fact that adoption of good management practices will provide significant benefit and could even exceed Environment Southland’s goal to “hold the line”.

In addition Environment Southland has committed to consult with the community regarding Southland’s water values to help determine limits, and findings from the Economics Project are essential to inform this consultation so that the public are aware of the resulting costs of various options.

Although the NPS-FM requires the management of water quality and water use, local government are directed to undertake this management in an integrated and sustainable way. The intent of the RMA is that the use and development of land and water resources are managed in a way that enables people and communities to provide for their economic, social, and cultural well-being. I am concerned that this Plan does not consider economic implications to the same extent as environmental issues, and this specifically undermines the intent of the RMA.
This concern is highlighted by the absence of Policies or Rules in the Plan that appropriately recognise and provide for the use of land and water to support the financial stability of farming in Southland, and therefore the overall Southland economy. I am not providing extensive feedback on all aspects of the plan, however the following are some key areas which I have received feedback on and I wish to echo the feedback I have received to Environment Southland.

Use of Physiographic Zones for Regulation (throughout the plan, but most specifically Rules 21, 23)

My biggest specific concern with the Proposed Plan and an area which I have received extensive feedback on from farmers is the underpinning use of the physiographic zones as a regulatory tool. Restriction of land use based on physiographic zones and/or regulation in this regard is not appropriate at this stage. The economic ramifications of such a step are significant and should not be taken without the full understanding which will be provided by the Southland Economics Project.

I have no doubt that the science behind the physiographic zones is solid and that it will have an important role to play when we are further down the limit setting process. Information provided by this science is useful in the development of good management practices on farms, but I echo the concerns raised by local constituents and oppose the implementation of actions based on physiographic zones. Especially given the current economic context for farming, any additional downward pressure on land values could prove very detrimental to Southland and I urge you to give this serious consideration.

An additional concern regarding the inclusion of physiographic zones in the Plan relates to the absence of a process to review the physiographic zone allocated to a landholding. The impacts of being allocated to a particular zone are significant and including these zones in the Plan makes the process to alter the allocations very costly and difficult.

Intensive Winter Grazing: Rule 23

The hectare limit on intensive winter grazing per land holding is a concern to many farmers. The existing system for winter grazing exists as it is the most effective way to ensure that stock can be effectively fed during the winter months when paddocks are sodden and grass growth is minimal. While intensive winter grazing clearly poses a high risk for nutrient and sediment losses, limiting feed to stock at that time of year is not an option.

I oppose the hectare limit imposed by this Plan as there is not a viable alternative for farmers to manage their stock through this period. The promotion of Good Management Practices around intensive winter grazing has the ability to allow the province to “hold the line” on water quality without risking animal health and farming viability.

Stock Exclusion: Rule 70

An additional concern I have which is also based on extensive feedback from constituents is the requirement to exclude stock from waterways on extensive hill and high country farms.

I support the removal of sheep from the stock exclusion rule as the water quality benefits which can be obtained by exclusion of sheep from waterways are questionable at best. In fact there is evidence to suggest that allowing sheep access to waterways actually has significant benefit in managing bank erosion.

I oppose the requirement to exclude stock from waterways on extensive hill and high country farms. The benefits to water quality from excluding stock from waterways on these farms
(which can be characterised by a low stocking rate per hectare) is questionable and, given the huge costs associated, cannot be justified. A cost-benefit analysis for this requirement has not been appropriately undertaken. The large numbers of kilometres of fencing over difficult terrain which would be required on these huge landholdings, and the additional requirement to establish a water supply system for stock drinking water, make this requirement impossible to meet in many cases, even if money were no barrier.

Farm Management Plans: Rule 20

I support the use of Farm Management Plans to help farmers to meet the need to farm within good management practices, instead of being required to farm under a consenting regime. However I do not wish to see these Plans become a major regulatory exercise for farmers which requires extensive office time, or engagement of consultants to produce them.

Therefore I ask Environment Southland to look closely at the contents of the Farm Management Plans listed in Appendix N and ensure that the requirements are limited to elements which will provide benefit to water quality. I question the water quality benefit of some of the elements listed in Appendix N, and I also have concerns about the cost-benefit of requiring a nutrient budget from Overseer for all farms over 20ha.

Finally, if Environment Southland is asking that all farmers submit their plans, there needs to be certainty that privacy of farmers is respected, and there needs to be a purpose for holding the plans. I suggest that requesting a copy of the Farm Management Plan from a specific farmer in response to an identified issue may be a less imposing approach.

Summary

Thank you for the opportunity to provide a submissions to the proposed Southland Water and Land Plan. I would like to genuinely congratulate and commend Environment Southland on the robust consultation process they have run. Having seen the successful consultation which was undertaken in 2015, I trust that this next submission phase will provide the same genuine interest in feedback to the Plan and I look forward to seeing appropriate amendments made in due course. I look forward to further discussion regarding this process in the future.

Thank you once again for your time and for the hard work and effort you put in, serving on council for our region.

Yours sincerely

Todd Barclay
MP for Clutha-Southland