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.

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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 do 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: __________________

(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.
ES Submission

Purpose of this Plan

The Southland Regional Water and Land Plan has been developed by Environment Southland under the Resource Management Act 1991 (RMA). This Plan is intended to provide direction and guidance regarding the sustainable use, development and protection of water and land resources in the Southland region. This Plan fits within, and is influenced by an RMA framework of national, regional and local policy documents.

➢ Environment Southland must recognize that traditional farming practices on Hill country farms have not changed over the years. As children we all swam in the rivers. We still can swim in the rivers. We cannot however swim in the rivers where farm practices have diversified into intensive practice with poor management of water allocation, effluent runoff and chemical leaching into the waterways or downstream of urban areas. These are the places having significant impact on water quality so why are we all being negatively impacted by other unfriendly environmental practices. ES gave consent for these practices initially and then failed to properly monitor the environmental effect of these practices so they need to be looking at the farms causing the most impact. All land

Policy 4-12

We support the use of physiographic zones.

Policy 7 – Bedrock/Hill Country

➢ We support good management practices.
➢ Farmers using traditional farming practices should not have to apply for resource consent to winter capital stock. Farm management plans will do nothing for water quality and is just more administration for farmers.

Policy 16 – Farming activities that affect water quality

➢ Policy 2b oppose- Traditional hill country farm like ours will not longer be viable if they are to fence and omit stock from all waterways. We strongly oppose this. We have 90 paddocks over 1650ha and each paddock have some form of natural waterway. To fence these to omit stock and to put in a water scheme would be grossly impractical and also financial crippling. It would also greatly decrease our land value as no one would purchase a property requiring so much development to comply. All bedrock/hillcountry farms to be removed from this policy.
➢ Under appendix N, only clause 5 Good Management Practises should be included. A Farm Management Plan will do nothing for water quality and is just more administration for farmers. Nutrient Budgeting using Overseer is flawed science. This software was
developed for Fertiliser sales representatives and no one will stand behind its use as a regulatory tool and therefore it should be omitted.

- Only Good Management practices should be included.
- If Farm Management Plan is to remain (not our recommendation), this should be a document held by farmers, for their use to improve management.
- ES to complete a study of volunteer farmers to look at the impact of nutrient losses and this data could be used to credit farmers at limit setting.

Policy 17
Ammend -Urban areas should be adhering to policies in line with rural. Holding the line on pollution isn’t good enough, we need to look at point source. ES is not doing enough to mitigate and stop pollution from urban and industrial zones. It is a much easier path to put this plan in place which puts more regulation on the agriculture sector as well as financial implications, when this sector is a minority in the cause of pollution in the region.
There are numerous papers that prove that the majority of NZ water ways are improving in quality which never makes the headlines.

- Change wording to “No discharge of raw sewerage and untreated agricultural effluent to water”.

Policy 18 – Stock exclusion from waterbodies

Policy 18
OPPOSE
SUPPORT the exclusion of sheep. OPPOSE the remainder.
These rules are already in place. The majority of low land water bodies have already been fenced off & it is very impractical to fence off water bodies in the hill country. Not only is it impractical but uneconomical. Our farm will no longer be viable.
The hill country is best managed by the farmers. Timed grazing prevents a lot of erosion on drains and river banks.

Policy 29 – Provide for the extraction of gravel

Policy 29
SUPPORT
This is hugely important and gravel needs to be extracted from waterways. In some areas larger consents should be granted.
Digging holes beside rivers should be illegal. Removing alluvial deposits (beach skimming) gravel should be permitted and encouraged. This benefits the wider community, the river users, the farmers and prevents damage to river banks and helps prevent Flooding.

Policy 39 & 40
OPPOSE
Applying for resource consent is a lengthy and costly process that we do not want, let alone applying for one with a clause like this.

- Remove from the plan
Land Use Rules

Rule 20 – Farming

Rule 20c OPPOSE
➢ Farmers should not have to seek resource consent to winter capital stock. This will have a significant impact on our business and our viability. We will no longer be able to winter our capital stock. This rule should be changed to include the farm size in relation to stock unit carrying capacity. No farm over 600ha will be viable or be able to adequately winter their stock.

Rule 23 – Intensive winter grazing

Rule 23 b (iv) We strongly oppose this ruling. This will have a significant impact on our business and our viability. We will no longer be able to winter our capital stock. This rule should be changed to include the farm size in relation to stock unit carrying capacity. No farm over 600ha will be viable or be able to adequately winter their stock. This is lead to poor stock health and animal cruelty. Off farm grazing will be impossible to source. Hill country Farmers should not have to adapt from their current crop allocation for capital stock as they are traditional practices. Farm values will also drop as a result in a significant decrease in carrying capacity. This Clause a should be removed from the plan. This is in no way going to improve water quality. ES reps should be more actively involved in on farm discussion with the farmer offering advice on best practise.

Rule 23 b (vii) We oppose this ruling as it is not practical for hill country farming. Hill country farmers should be allowed to consult with ES and work together and plan manageable ways for hill country farms to adapt. Hill country farm topography is challenging and therefore a blanket ruling is impractical and impossible to implement for fencing criteria.

Rule 25 – Cultivation on sloping ground

Rule 25
OPPOSE
Oppose permitted activity limit of 20 degrees
25b ii Not allowing cultivation anymore than once in a 5 year period – for the purpose of planting your brassica crop and then returning to pasture you need to be allowed to cultivate it more than once.
➢ Change to Farmers are allowed to cultivate three times in a 36 month period for the practicality of farming.
Increase to 30 degrees.

Bed disturbance activities in river and lake beds

Rule 70 – Stock exclusion from waterbodies

Rule 70

A MMEND

Support exclusion of sheep

OPPOSE extensive hill and high country farmers being required to exclude stock.

Cattle are a very important tool in looking after high country. They open it up for the sheep to control the feed and weeds. Fencing off every waterway is impractical & uneconomical. Our farm would not be viable if all waterways were to exclude cattle. Sheep and beef farming are going through economic hard time already. High country and hill farmers manage land a lot better than ES ever could.