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: Anthony Rayner Byars
Organisation*: AraTJ Byars Trust
Postal Address: Waikaka RDS
Email: arbyarsенькxtra.co.nz

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: Anthony Rayner Byars
Date: 28-7-16

(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
Southland Water and Land Plan Submission.

Page 2

OPPOSE

What is this? We don't need "Maui like" stories.

SUGGEST

Remove

Preamble

Page 5

AMEND

Again, what is Te Mana o te Wai – One cannot comment on its national significance if one has no idea what it means.

SUGGEST

Translate

Issues – water quality

P. 14

OPPOSE

......“non point source discharges from agriculture land are the most significant contributors of contaminants”

SUGGEST

Remove. Accurate, updated research needed.

Policy 16

1(a)

AMEND

How close is “close”?

SUGGEST

Clarify

2(a)

OPPOSE

Who is paying for all this extra paperwork? As farmers, we are not going to let our land or waterways deteriorate. We do not need to write it down – conditions may necessitate unforeseen changes to plans. We are at the “coalface” and are already managing points 2(b) and (c). Strongly object to the requirement of a farm management plan.

SUGGEST

Remove

Already have rules and regulations in place

Policy 47

4

AMEND

How do you assess water quality and quantity based on “Ngai Tahu indicators of health”?

SUGGEST

Clarify. Surely a proven testing procedure must be used.

Page 41

OPPOSE
<table>
<thead>
<tr>
<th>Region Wide Rules</th>
<th>Page 49</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Farming Rule 20 (a)</strong></td>
<td><strong>OPPOSE</strong></td>
</tr>
<tr>
<td>A landholding up to 20 hectares should not be treated any differently than a larger holding. These are frequently intensively farmed and can equate to the cultivated area on any larger holding.</td>
<td>SUGGEST</td>
</tr>
<tr>
<td><strong>Rule 20 (d)</strong></td>
<td><strong>AMEND</strong></td>
</tr>
<tr>
<td>Physiographic zones are not black and white and may not as yet be correct.</td>
<td>SUGGEST</td>
</tr>
<tr>
<td><strong>Rule 20 (e)</strong></td>
<td><strong>OPPOSE</strong></td>
</tr>
<tr>
<td>as for rule 20 (a) Treat all holdings the same.</td>
<td>SUGGEST</td>
</tr>
<tr>
<td><strong>Rule 23 (a)</strong></td>
<td><strong>AMEND</strong></td>
</tr>
<tr>
<td>Intensive winter grazing of sheep using good management practices has little effect on waterways.</td>
<td>SUGGEST</td>
</tr>
<tr>
<td><strong>Rule 23 (b)</strong></td>
<td><strong>AMEND</strong></td>
</tr>
<tr>
<td>(iii) &amp; (iv) I do not agree with a stated hectare size of a holding as opposed to a % of holding.</td>
<td>SUGGEST</td>
</tr>
<tr>
<td>(vii) Distance from outer edge of the bed is too far. Sheep do not make enough mess to justify 20m no matter what the slope.</td>
<td>SUGGEST</td>
</tr>
</tbody>
</table>
Page 54 Rule 25

a (i) AMEND Unworkable. Contrary to National policy statement which takes economics into consideration.

SUGGEST 3m from bed edge irrespective of slope.

a(ii) OPPOSE Slope of 20deg is excessive. Farmers know what is economically viable & also within safety regulations.

SUGGEST There are enough regulations now to cover environmental concerns Work to old plough lines if you must add more paperwork.

No more regulations are necessary.

Page 81 Rule 59

AMEND 1200mm may not be the best option depending on the work being carried out.

SUGGEST Should be able to apply for a bigger size if more environmentally beneficial.

General

I regret I have only had time to read through to page 70. This is an important document which needs careful consideration by all. ES did not communicate its existence, therefore more time to review it would be appropriate.

I commend ES on their efforts to look after our waterways but do not believe bulldozing/legislating people into writing “plans” on paper is the way to obtain optimum results. The wellbeing of a community revolves around many things including the economics of farming. I am concerned at the added costs this plan will thrust on to farmers to obtain consents for common sense practices. Many of the areas of concern to ES (those I have commented on) are adequately governed now. I don’t believe anyone wants to see waterways deteriorate and do not think farmers should be the only ones paying for the benefit of everyone else. Farming is not the only industry using water, neither is its management black and white (a fact ES seems to have no understanding of). I see no benefit in a farm management plan, which is continually under review, to ES. More time is needed to implement/gauge planned changes.