Submission to Environment Southland on proposed Water and Land Plan
July 2016
From PJ and EM Cruickshank
(Small farmers of 20 – 100 hectares at each of two properties within Invercargill City boundaries)

Preamble
This Water and Land Plan document of 205 pages, containing roughly 40 major policies and 79 new rules is totally unrealistic for busy farmers to read and absorb, let alone submit detailed responses and objections to, in a very short period of time. While ES is to be commended for its detailed study of the underlying soil types of our province and their ability to absorb and filter water and/or nitrogen etc, so that our farmers can better understand what farming practices are best suited to their soil types; and want to improve water quality, they can only make major changes to their management if the revenue they can generate makes it worth their while.

It will be injurious to their mental health to impose repressive restrictions on land use, which they will barely have time to acquaint themselves with when they are already so busy farming animals and land to the best of their ability. Dairy farmers have different needs and priorities to sheep and beef farmers and they impact on the land and water to a far greater extent than sheep, beef and cropping farmers though many are very good at mitigating these impacts already. We consider that it is unnecessary to require farm management plans for all sorts of lower impact farming systems.

Farmers already have to adapt to unexpected weather conditions (such as the 1978 and 1984 floods), droughts, new laws, the vagaries of fluctuating market prices and new pests and diseases which enter NZ unexpectedly, and stringent health and safety legislation.

If this repressive new regime is implemented, many farmers may quit and land prices will collapse because few will want to operate under such highly detailed, costly and controlled systems. Marginal land will be sold for housing where possible or left to the ravages of scrub weeds and wild animals. If farming is no longer financially viable nor practical to do; what incentive is there to continue farming? Who will then pay the ES rates, let alone their annual charges for perusing farm management plans. Farming is always fickle, and so are incomes from farming.

As former National President of Federated Farmers, Don Nicholson predicted in a letter to the Editor this week, this plan will cause such a catastrophic reduction in the wealth of the province and NZ going forward, that any good arising from the policies will be negated by the bankruptcies, loss of tax revenue and unpaid rates. Don is much more able to see the wider repercussions than we are.

There is far too much detail to object to but the following are some specific aspects:
Policy 33 – is too restrictive on drainage and vegetation removal. Existing use rights should be honoured.

Policy 39 – ES shouldn’t require resource consents for current existing sheep farming practice such as rotational cropping for swedes, chou and fodder beet. These crops are essential when grass stops growing for 100 days. Winter feed crops are the best way to sustain good animal welfare and survival. Reliance on rotational grazing of grass in our climate with heavy rainfall, and snow can be unreliable and result in livestock losses and poor animal welfare as well as sealing off the tile drains. Cattle on all grass would be even worse and almost impossible in our climate on flat low country land.

Freshwater Management Unit policies – we seriously object to no deviations being allowed regardless of existing rights.

Rules 1 – 4 are totally repressive.

Rule 13 We object to ES making discharges of surface water a “Controlled activity”. What if during exceptionally heavy rainfall such as are happening worldwide with climate change - some discharges cannot be controlled - what then? (for example the 1978 and 1984 floods?)

Rule 23 Intensive winter grazing. Permitted if mitigations are in farm management plan and all drains are listed. This is impossible because we do not know where they all are. If sheep are being intensively grazed on winter feed, then the runoff of nutrients is much less than if cattle are grazed on them, so distances on slopes of greater than 16 degrees from waterways should not be of concern if only sheep are grazed there and not cattle. Also number grazed will vary the runoff too with small numbers being much less intrusive than large numbers.

Rule 59 We hold the view that culverts and their placement should not need to be considered by ES staff – this is excessive interference. Much other minutiae can also be dropped without seriously impacting on the overall plan.

Tangata whenua involvement: we note that the Auckland Unitary Authority this week intends to cut back on consultation with the tangata whenua in its plans for Auckland City and we feel that with ES the consultation already carried out to reserve traditional food gathering etc is adequate. We also point out that the maori were not great conservationists in the past with widespread burning of forests and grasslands throughout the South Island. They also caused the extinction of the Haast Eagle and the moas for example, and drastic reduction in numbers of most other birds including the kakapo before the European set foot in NZ. And is still harvesting wood pigeons.

We are pleased to see that ES wants to encourage more sustainable energy generation such as wind farms and hydro, but we note that Ngai tahu originally
objected to the latest wind farm on Green Hills. Also ES and ICC missed a great opportunity to be innovative by not requiring turbines for tidal power generation in the recently re-built Tiwai Bridge.

In our own situation farming at Rosedale and Awarua, our ability to earn a modest revenue on these properties will be even more reduced under your new proposals. We draw your attention to our submission on the PSRPS draft Chapter 5 dated Wed 24 Sept 2014. We have never been compensated for having 40 hectares of land incorporated in the Waihopai flood spillway below the detention dam, and now your Land and Water plan is imposing more limits on our land use and management.

We have just recently spent approx. $8000 on ditch cleaning below the Bainfield Road hills which used to be cleaned by Southland Catchment Board. Will we require a permit in future to clean a ditch which services the run off from about 12 ratepayers right down to Thomson’s Bush. Without this being cleaned our paddocks would be unusable. At Awarua we farm adjacent to the Wetland reserve and have planted many thousands of forest trees as approved by the Government but our landuse will be severely impacted by your proposals.

We enclose some photos of the land we had inundated by the floods alongside the Waihopai River.

Yours faithfully

[Signature]

Peter and Liz Cruickshank

Rosedale,
200 Wilton St.
Fmtercrgill
26/7/16
Rosedale house paddock

1978 Flood

Full of water runoff from Neava St + Rosedale suburb.
The stop banks remained intact in the 1978 flood.
P.J. Crickshank's property.
Waihopai Straightened in 1956 biected our farm in two. 2 Rights of way for private bridges were granted as well as a R.O.W along the North bank - in perpetuity - but revoked after 1984 flood when the stopbanks and berms were widened.

Queens Drive paddock as it was post 1984 flood

Queens Drive Bridge showing inundated farm

Gravel dumped in paddock where stopbank was taken out in 1984 flood when timber from Kennington dammed the river against Cruceshank bridge which was designed by our architect.

Swann swallow buried in mud