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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* the organisation that this submission is made on behalf of
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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
- [x] 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:
- [x] 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: [Signature]
Date: 31-7-16

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

I agree water and land are fundamental resources on which the wider Southland economy relies upon.

Development and intensification over many decades has created much of the wealth of the province. The challenge for the community is to continue to develop and intensify land and water based activities for ongoing wealth creation, while maintaining natural resources for future generations.

Specifics of the plan

Physiographic Zones

I oppose the use of Physiographic zones as a basis for setting rules.

Physiographic zones are interesting but not relevant. The issue is about human economic activity in Southland.

All areas have drainage - overland, natural, and modified.
All areas have water abstraction for - humans, animals, crop, and manufacturing.
All areas have water discharges from- human, animal and manufacturing.

Separate zones are not relevant and just complicate the plan.

More relevant are things such as topographic, soil type, land use and communities of interest. Therefore each farm business can be assessed on its own merit.

Physiographic zones are new science that has not been peer reviewed or ground-truthed on farm. Farms may have a variety of physiographic properties within their boundary but will be arbitrarily placed in a zone purely because of where a line was drawn on a map.

Physiographic zones were not designed as a regulatory tool.

Physiographic Zone Policies

I oppose the use of individual Physiographic zones to determine policies.

Apart from the Alpine zone all other proposed zones mention drainage and some like the Alpine zone mention overland flow. Therefore there is no need to segregate into zones.

Recommend areas of commonality, individual farm type, farm practice and management plans be the basis for what is allowed on any property.
Rules

9  Support as written

10 Support as written

11 Support as written

13 (a) Support all except 13(a) v: Because there is no benefit relative to the cost of compliance.

13 (b) Oppose. Recommend it be a controlled activity.

14 Support as written

15 Support as written

16 Support as written

17 Support as written

18 Support as written

19 Support as written

23 (b) iv Oppose. The area should be a percentage of the farm with a degree of flexibility based on facts such as topography, soil type, crops grown as outlined in a Management Plan. Recommend 20% - may need more depending on setbacks.

vi Oppose. No benefit relative to the cost of compliance.

vii Oppose. Management Plan should determine. Recommend the proposed distances be guidelines. Consideration given in the management plan to things such as type of crop, stock class, way paddock is grazed, cultivated or direct drilled, riparian strip present or not.

vii Oppose. The word Lake needs defined. Recommend a natural continuous area of permanent water holding greater than 1 sq km.

ix Oppose. Subjective and impossible to interpret, as under heavy rain events water flowing off permanent pasture can cause discolouration. Recommend removing clause. The area may change considerably due to setbacks, critical source areas and different classes of land within a farm property.

23 (c) i Oppose. One of the unintended consequences of all the rules could well be more land is required for winter grazing in an effort to mitigate the effects of intensive winter grazing. Recommend removing the area requirement and move to a percentage of total farm.

Overall rule 23 in total is poorly worded and poorly thought through. No consideration appears to have been given to the unintended consequences of more land being required or flat land being intensified with high yielding crops.

25 (a) i Oppose. As per reasons in 23 (b) vii
25 (a) ii Oppose. It assumes all slopes in all areas under all management practices re-act the same. Not practical as some flat paddocks may have a small percentage of slope just over 20 degrees that would require consent and if not given, that area could not be utilized for a year. That area would then be a non productive waste area and maybe nowhere near a water course. Could well mean more area required elsewhere on farm for winter crops. **Recommend** that the Farm Management Plan be the vehicle for determining what can be cultivated as this rule is not practical and very difficult to enforce.

25 (b) Agree

25 (c) Oppose. **Recommend** it be a controlled activity.

54 (a) i Oppose. The amount of water allocated should not be per landholding as it has no relevance to need. It should be based on an amount per ha. **Recommend** 500 litres per ha per day regardless of landholding size.

70 (a) i Oppose. Subjective statement. **Recommend** removal of that clause.

70 (a) ii Amend – Good practice would suggest large animals (cattle, deer) be excluded due to the damage caused to waterbodies and the surrounding banks. However total exclusion particularly of sheep should not be encouraged as a carefully grazed stream bank will do more good than harm. Long overgrown banks are prone to slumping, are a haven for weeds, gorse, broom, ragwort and hemlock, the seeds which are then transported downstream.

The drainage team in Environment Southland advocate in favour of sheep being allowed to graze stream banks.

78 Support

**General**

1. Very detailed economic analysis of the direct and indirect costs of implementing the plan must be carried out and made available for discussion prior to approval of this plan.

Such analysis must include:-

- The wider implications of a longer term drop in production.
- The flow on spending in the wider community.
- The devaluation of property as a direct result of plan rules.
- The loss of investment confidence created by the plan.

Also included must be:-

- Assessment and cost of the practicalities of implementation on farm systems.
- The unintended consequences of a rules based approach.
- How monitoring and enforcement will be under taken.
- Who pays for what.
2. This plan is very focused on rural land use and only the larger businesses. Small semi rural and rural lifestyle properties should be included.

Urban areas also contribute to land and water contamination, so should also be included as it is a Southland plan and the Southland Regional Council is responsible for all of the territorial authority.

3. More detailed definitions are required as much of the wording is subjective or open to interpretation. Specifically:
   - Lake
   - Contaminant
   - Avoid (according to the Oxford dictionary means “refrain from”) Recommend using minimize instead of avoid.

Summary

No farmer deliberately sets out to degrade the environment he or she uses to derive income. All are custodians for the next generation and aim to leave their property in better condition than when they received it.

I am happy to farm within a framework that is practical and sensible to interpret and one which can evolve over time as technology and innovation leads to improved outcomes.

As farming is a dynamic business, a plan cannot be a black and white rule book set for all time. There needs to be the ability to adapt to the seasons and situation at the time. No rule or plan can be pre determined for all events, especially significant weather events such as prolonged or extremely heavy rainfall, snow or long dry periods.

Land use intensification in Southland has been ongoing for the past 150 years and that will need to continue for the economic well being of the province.

The community must accept that any improvements anticipated from the implementation of this plan may not happen quickly. The Regional Council has a role in managing that community expectation.

If implementation of this plan leads to an increase in the cost of production on farm, producers will respond with less inputs which will directly impact the wider Southland economy and population.

The Regional Council needs to be cognisant of the Southland Regional Strategy which is targeting population growth. The unintended consequence of this plan could actually aid population decline.