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: Ross William McKenzie
Phone (Hm): 03 234 9834
Organisation*: McKenzie
Phone (Wk):
* the organisation that this submission is made on behalf of
Phone (Cell): 021 249 5767
Postal Address: 267 Longwood Rd
Fax: 
1 O D Invercargill
Email: mckenzie-mckenzie@xtra.co.nz
Postcode: 9811
Contact name and postal address for service of person making submission (if different from above):

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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: McKenzie
Date: 31-7-16

(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 8 of Schedule 1 of the Resource Management Act 1991
RW& DM McKenzie (Knockinnon Farm Trust)
Longwood RD 1
Riverton  9881
Ph 032349034
30 July 2016

Water & Land Plan – Amend
Support the intent of the plan to improve water quality however the process needs to be improved.

- **Recommend** a more collaborative approach to the Southland Water and Land Plan.
- All sections of Southlands community to be included. Urban, business, fishing, forestry as well as farming

Physiographic Zones - Amend

Current zones don’t take into account climate, soil types, topography and geology of a regions, smaller catchment or individual farm.

We oppose the zoning of our farm at
1549 Riverton Orepuki Highway SEC54 Blk V11

The flat area of the farm is zoned peat. This are was gold mined and the late 1800’s by dredge to a depth of at least 1500mtrs as a result any peat was washed away and has been replaced with sand as a result of the extensive sleuthing carried out in the Longwoods. Test holes have shown sand to 4 plus metres.

- **Recommend**. There be a documented process included in the plan allowing individuals to appeal/contest the physiographic zones and boundaries of their land holdings. Need to ensure that new research and science is taken in to account.

Objective 9: Oppose

The guidelines for water quality is at it stands is too narrow.

- **Recommend** Equal application of the rules over all values. We recommend that as per the RMA, equal importance be given to the four pillars-social, economic, cultural and water quality.

Policy 46 Amend

- **Recommend**: We agree in principle to the splitting Southland into Freshwater Management Units however there needs to be sub-catchment representation as we proceed towards the limit setting process.
Rule 13 Discharge from installed subsurface drainage systems. Amend

- **Recommend.** An allowance is made to clean drains using water blasting or similar cleaning method.

Rule 20 Farming. Appendix N Management Plan Requirements. Amend

- **Recommend.** Clarity on how farm plans are to be managed, the auditing process and time period between audits.
- The date is changed to for example 30th May 2018 to allow farmers time to ensure that they meet the conditions of the farm plans.

Rule 23 Intensive Winter Grazing. Oppose

We oppose the reference to any area as this impedes land rights. Larger farms are disadvantaged under this policy. The wording suggests that if you have mixed physiographic eg peat or Old Mataura 20ha of crop can be grown. Over the farm there needs to be an allowance for 50ha with a maximum of 20ha on the peat of Old Mataura areas. As it stands the rule limits the ability for a larger scale farmer to manage their stock wintering within best practice. All reference to areas or percentages of land holding should be removed from the plan. The current definition of a lake penalises any work carried out eg restoring wetlands, having sediment ponds or ponds for beautification.

Rule 32 Effluent Storage (land use consent) Amend.

- **Recommend.** Change from non-complying to discretionary to allow farmers to take up any opportunities that advances in science and technology might allow.

Rule 35 Discharge of agricultural effluent to land. Oppose.

Is it necessary to, for example test an effluent pond that has been designed and constructed in the last few years by qualified engineer?

- Change Chartered Professional Engineer to suitably qualified person.
- Change of wording, only effluent ponds to be tested.
Rule 38 Animal and Vegetative waste. Support in principle

- **Recommend.** Dates restrictive as winter for example, winter may in many cases be the only practical time during the year to carry out lane maintenance etc.

Rule 54. Abstraction and use of groundwater. Oppose

**Recommend.** The current water permit process is fair and we recommend that it remain as it stands.

Knockinnon Farm Trust RW & DM McKenzie
267 Longwood Road and 1549 Riverton Orepuki Highway.

In the past 5 years we have

- 2013 Compiled a comprehensive effluent management plan.
- In 2014/15 after much professional advice and input we up-graded our dairy farm effluent system to include a solids separator, a 3 million litre pond, extending irrigation area with pods at a cost of $250 000.00
- 2014 With 5 other farmers formed the Pourakino Catchment Group.
- In 2015 purchased a Metallion Tow and Fertiliser Spreader. This applies the fertiliser in liquid form and allows for it to be spread at a lower level in liquid formation thus reducing nutrient loss. Purchase cost $100 000.00
- 2015. With the Assistance of David Moated compiled a Farm Focus Plan.

**Final Comment**

There is a continuing strong negative focus on farming when it comes to environmental issues in our region. All business, industries and individuals need to be equally accountable for our water quality and environmental sustainability. We, like many other farmers are committed to farming environmentally and are continually making the necessary changes to our farming practices to allow this to happen. We would also like to take any opportunities as they arise to become more economically as well as environmentally sustainable.

However, unfortunately we see the current proposed land and water plan as being overly restrictive and could therefore have a very negative economic impact on ourselves and on the Southland region.