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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Fax:

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: 27 July 2016
(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.
The specific provisions my submission relates to are:
(Specify provision number and title, e.g. Policy 17 – Effluent management)

<table>
<thead>
<tr>
<th>Provision</th>
<th>My submission is that:</th>
<th>The decision I would like Environment Southland to make is:</th>
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<tbody>
<tr>
<td></td>
<td>(Please include whether you support, oppose or wish to amend each separate provision you have listed in column 1 and the reasons for your views.)</td>
<td>(Please give precise details of the outcomes you would like to see for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you seek.)</td>
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<tr>
<td>EXAMPLE</td>
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<tr>
<td>Appendix G</td>
<td>Popular bathing sites should include Makarewa River at Wallacetown.</td>
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</tbody>
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Form 5: Submissions on a Publicly Notified Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991
Submission on proposed Southland Water and Land Plan

Robin Greer
651 Wyndham Road
Tuturau
Email robin@retroorganics.co.nz

Support

I totally support the plan in its aim of improving Water quality in Southland.

We farm a farm under an Organic system and process the milk on farm and market our Cheese, Yoghurt, and milk throughout New Zealand and also export.

We recognize the value that can be added to our primary produce by having a good environmental footprint.

We have two dairy farms one an organic systems based farm and the other a conventional dairy farm.

Mataura Freshwater Management Unit

I question the plan in looking at the entire Mataura catchment as one area.

The Mataura catchment has such huge differences in soils, contour, rainfall, farming types and systems.

Northern Southland is so different to the lower Mataura area.

The issues that have to be looked at vary greatly which I believe could be much easier be dealt with by breaking the catchment into smaller areas or sub-catchments.

It would be much easier to get buy in from farmers if it was relevant to them which breaking the catchment into smaller areas would achieve.

As a farmer in such a large catchment I am concerned that come limit setting time we will be subject to catchment limits that reflect our location at the lower end of the catchement. I am concerned that catchemnt limits will be placed on my farming oeprations in an inequitable manner. A sub-catchment approach would be more effective and could empower local farmers to address water quality issues within their communities. Sub-catchments would create better defined groups of interest in locals areas.

Given the wide range of interests in water in the Mataura Catchment and its vast size it would appear unlikely that limit setting will be able to be undertaken in an equitable and fair manner.

Rule 23 (c)

Oppose
I believe it to be extremely unreasonable to limit the area of a landholding to be restricted to 50 hectares of intensive winter grazing.

This rule administered in the present form would lead to big differences in land values for different property sizes. Is this really what these rules should be doing?

It could also lead to farmers changing ownership arrangements which would lead to legal professionals making extra income, from farmers that could be better spent on environmental improvements.

So a property with many titles could change the legal ownership of each title and be able to intensively winter graze on the total land holding.

If I farmed 50 hectares I could intensively winter graze all of my land holding.

If I farmed 1000 hectares I would still only be able to intensively winter graze 50 hectares of my land holding.

I believe if it has to be restricted then it needs to be calculated as a % of the land holding.

This would remove the incentive to change ownership structures to get around this rule.

**Different Farming systems**

I struggle with the fact that the plan unintentionally has the potential to dramatically affect the earning capacity of a property and or its value by not taking account of the issues I list below.

The plan appears to make no allowance for different farming systems.

According to the plan there is no allowance made for an Organic system like we farm on one of our property's and a farm that is farmed intensively, when research from Massey University farming systems showed that an organic farm leaches over 50% less nitrogen to a conventionally farmed property.

(The impact of Organic Dairy Farming on the Aquatic environment.by D Horne, A Thatcher, I Brookes, A Palmer, K Harrington, T Kelly, P Kemp, N Shadbolt.)

This would not only apply to organic farms but also conventional farms that are farmed in a similar manner to our organic farm of which there are a number of in Southland.

Should not more emphasis be put on taking account of the outcome of a farming practice rather than the broad view that the plan uses?

The plan encourages the use of less environmentally friendly farming practices by not recognizing and promoting alternative farm systems.

The plan in its present form encourages us to change to conventional farming practices and change to bigger Friesian cows, effectively increasing our stocking rate. This would have a negative effect on the environment but improve our financial returns.

This is because the plan refers to cow numbers not Kg of body weight per hectare

Is this really what we want this Plan to do??
Also cows are all grouped as cows, but we farm Jersey cows which would have half the body weight of some of the bigger cows that are farmed. There is no recognition in the Plan of the differences in stock type and the fact that farming of this stock can have a lower environmental footprint.

I believe it is unreasonable to group all cows as having the same environmental impact without taking account of stock size.

An answer to this would be basing restrictions on Kg of cow’s body weight per hectare.

Is it not better to rule on outcomes rather than broad over views that can have vastly different outcomes?

The Plan does not recognize, provide for or encourage those farmers who already operate with lower levels of environmental effects. This can include organic farms but also many conventional farms whose farm activities and systems are based around similar low levels of inputs such as fertilizer.

The Plan assumes a worst case scenario in relation to potential environmental effects of farming. Farmers that operate alternative farm systems and those that already utilize good management practices are not incentivized to maintain these practices. There should be recognition at policy level in the Plan of potential benefits alternative farming systems such as organic farming can provide. The Plan should also recognize the mitigation certain stock types can have environmentally.

**Rule 25**

Restricting cultivation of sloping ground (greater than 20 degrees slope)

We purchased land which we use for wintering which has land with sloping ground above 20 degrees slope which we have very successfully wintered on in the past but would no longer be able to do this under the rules of the new Plan.

This would encourage us to milk more cows on this property (farm it more intensively) and graze cows off.

It appears to me that this slope is set at too low an angle.

**Physiographic Zones**

While in general I agree with the breaking the region into Physiographic zones I believe that a land holder needs to be able to challenge the zoning of their property as there are areas that could be different to what the zones are saying.

This needs to be able to be challenged without it been a big financial burden to the land holder. The Physiographic zones are based on ‘high level’ science and I am concerned that they do not accurately reflect characteristics at an on-farm scale.

**Summary**

I wish to be heard in support of my submission.

I will consider making a joint case.

I could not gain an advantage in trade competition through this submission.

Thank you for providing the opportunity to submit on the new Water Plan.
Robin Greer
651 Wyndham Road
Tuturau