Submission on proposed Southland Water and Land Plan

Email your completed submission to policy@as.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: Peter and Yvonne Philskie

Organisation*: Hillview Trust
* the organisation that this submission is made on behalf of

Postal Address: 106 Epsom Road, Waihola
1 AD, Invercargill

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Phone (Cell): 0224 327 914
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Fax:

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
☐ 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: 29 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.

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 PART A

To: Southland Regional Council
   policy@es.govt.nz

Name of submitter: Peter and Yvonne Phiskle

This is a submission on the proposed Southland Water and Land Plan Part A (3 June 2016).

Submission on Proposed Southland Water and Land Plan

1. We are concerned that the proposed Plan which is appears to be primarily directed at providing additional controls on dairying within the Southland region does not also adequate account for urban activities which occur in the region which may have greater environmental effects than dairy farming.

2. We are concerned with the release of PWLP in that it was not well timed enough for people to respond accordingly and to do research into the proposed regional plan. Releasing the plan on the 3 of June coincides with a time where many dairy farmers leave for their holidays as the milking season doesn’t leave many opportunities to get off the farm and that fewer dairy farmers in particular would have had a chance to look over the plan than are to be affected by its Rules.

3. Also in terms of the timing of the release of the PWLP this has been a busy time of year for us in particular, especially as we have been through sickness while having to manage the wintering of our cows including shifting of stock and feeding out, as well over the past two months which has mean that researching in to discussing and the plan and on this basis we would appreciate a timeframe extension for this public notification process.

4. Finally, we would like to know what tangible outcomes are expected from this from this PWLP document and from these rules. There has been a huge amount of effort put into the fencing of waterways throughout southland, with the continual improvement of good management practices over the past 15 years being of a high priority particularly on our farms. There is limited provision for the recognition of those environmental gains and significant levels of investment we have made in our properties over the past and those gains we will continue to make into the future in the future, and instead council have opted for a greater consenting framework and requiring higher investment from farmers particularly in terms of preparing management plans and nutrient budgets etc...

5. We have always been mindful of our practices and procedures, and want to achieve good environment outcomes while continuing to farm the land how we see best and we do not believe that the proposed plan will allow us to do this. We support the ES plan in that it
aims to maintain and improve water quality in the Southland Region and this is an aim we
feel strongly about. We believe we have made significant steps towards improving water
quality on our property which is our responsibility. However, regardless of the
improvements we have made, we still feel that we are being targeted, and that the dairy
sector has been targeted specifically to carry the entire burden of effects on water quality.
We believe this is ultimately the responsibility of every person in the Southland Region and
not just one sector (being the dairy sector) as the PWLP seems to make out. We promote
environment southland to further investigate policies and objectives to share the cost and
burden of maintaining and improving water quality equally across all land and water users
in the entire Southland Region.

Proposed Plan
The specific provisions of the Proposed Plan that this submission relates to are:

Rule 23 – Intensive Winter Grazing

Submission – Oppose in part

6. Rule 23 outlines the permitted thresholds for intensive winter grazing which may occur on
a landholding as being 50 ha on any landholding within the Riverine, Gleyed, Bedrock/Hill
Country, Oxidising Central Plains or Lignite Marine Terraces Physiographic Zone. As we have
two neighbouring properties which we occupy but operate separate we believe that
permitted baseline should apply to each of our farms – not to our landholding (which under
the current definition would include adjacent properties with a common occupier),
particularly as that will halve the intensive winter grazing (grazing of stock on forage crop
between May and September inclusive) we could undertake as a permitted activity on each
separate farm.

7. We do not believe this was the intention of the Rule, but how it currently reads is messy,
and not fair for property owners who operate two adjoining farms separately.

Decision Sought
That the permitted baseline applies to each of our farms separately and not to the landholding.

With Rule 25(b)(iv) to read as follows:

"not more than 50 hectares of intensive winter grazing is undertaken on a landholding
farm within the Riverine, Gleyed, Bedrock/Hill Country, Oxidising, Central Plains, or
Lignite-Marine Terraces physiographic zones;"
Rule 35 – Discharge of Agricultural Effluent to Land

Submission – Oppose in part

8. Rule 35 talks about the discharge of effluent to land from only one feedlot or wintering pad is permitted per landholding. Same as above we believe that this rule should apply to each farm not each landholding as it will unnecessarily trigger the need for a resource consent if we have a feed lot on each of our neighbouring properties.

9. Additionally, the Rule reads “feedlot or wintering pad” where only one or the other falls under the permitted threshold in terms of discharge of effluent as a permitted activity (no resource consent required). We believe this should be for both structures i.e. “feedlot or and wintering pad” as they are separate structures.

Decision Sought
That the Rule provides for one feedlot and one wintering pad as permitted and that the rule applies to each farm not each landholding.

Rule 70 – stock exclusion

Submission – Support

10. We support the exclusion of stock from waterways, particularly dairy cows.

Decision Sought
No changes are sought.

Peter & Yvonne Phiskie
Date 1 August 2016
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