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
☑ 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: ___________________________ Date: August 1st 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 from David Rose

on the Environment Southland Land and Water plan 1-8-2016

Physiographic Zones
Oppose- The use of Physiographic zones in this plan.

Reasoning
1-This is due to the Validation and Testing report being unavailable and no Peer Review document being available. We cannot access the validity or limitations of this science being applied in this plan.
2-The use of them in the draft plan is effectively grandparenting of land use in some zones and is being done before the Southland Economic Study is available and before the catchment limit setting process which is unacceptable.

Decision- Remove Physiographic Zones from the plan

Physiographic Maps
Oppose the use of Physiographic maps in this plan.

Reasoning
1- The maps have not been groundtruthed.
2- On my own farm I have Gleyed physiographic zones which have the characteristic of having extensive artificial drainage. While it is true for 2 of my properties but my Northope river flat property does not have any artificial drainage at all? I also have Riverine on my Northope property which has the characteristic of shallow stony soils this too does not make sense as I know I have very little gravel exposed on my property when I plough even in my berm paddocks close to the river. From my own observations I do not accept my physiographic zoning. I have a lifetime of practical experience on my property.
3- I do not accept that it is my responsibility to prove your modelled maps are correct.
4- If approved in this plan the maps will be locked in and only reviewable when the plan is reviewed.

Decision - Remove Physiographic maps from the plan.

Stock exclusion from waterbodies – Rule 70
Support sheep do not have to be excluded from waterbodies

Reasoning
1 The environmental benefits of a close grazed riparian margin to prevent slumping
2 Sheep help stop weed infestation along waterbodies
3 The huge cost of exclusion and practicalities eg fencing
4 Alternative stock water cost can be huge
5 GMP can limit effect to minor.
6 With complete exclusion slumping is a huge issue.
Decision – keep sheep not excluded from waterbodies.

Hill and High Country
Oppose – Exclusion in Hill and High country farms
1 If stock is being managed in a way that has little effect where is the problem?
2 Often not practical or workable
3 Control of weeds is a real practical benefit of grazing
4 Urban perception where there is no problem is not a reason for exclusion
5 GMP can help limit the effect to minor.
Decision – Review hill and high country exclusion against practical considerations. Do not let urban perceptions override factual information.
Farm Management Plans
Support Good management practices (GMP)
Reasoning
1 GMP’S are practical and able to be implemented in most farming situations
2 They are flexible. DDT application was once a GMP against grass grub it is no more.
3 Are not rigid like rules and can relate easily to various farm types and climates.
4 Will improve environmental outcomes as implemented and new GMP’s are used
5 Great examples in the Waituna Catchment of GMP uptake.
6 Covers all farm activities

Nutrient Budgets (NB)
Oppose compulsory Nutrient Budgets
Reasoning
1 Inaccuracy for Sheep and Beef and arable sectors.
   Three budgets done on the same property N leaching varied from 13 -24 each answer were different.
2 There are capacity issues with getting NB completed.
3 There is substantial cost around $2,500
4 No benefit to many farmers.
5 Does not preclude Farmers doing voluntarily
6 May mean farmers can complete farm plan themselves and will value the document.
Decision – Remove compulsion to do NB.

Farm Maps
While I am not opposed to Farm Maps and have had a to scale map all my farming career
I question the need for so many different maps. While having fantastic maps in the office
when the contactor arrives is it not more important to have a conversation with him about where
the plough line is?
Some people will naturally love the pictorial aspect of a map others not so much.
Decision – Simplify mapping to having a farm map

Content
Decision -Simplify content so GMP are the key element
Reasoning
1 Farmers will support this
2 Location of drainage systems where known does not improve water quality
   I have no drains in my river property and my terrace properties have thousands of field tiles in every
gully which are easily identified. No need to map.
3 How do heritage sites improve water quality?

Auditing
Oppose any strict auditing regime
Reasoning
1 The weather plays a large part in farming
2 On the worst day in the year several years ago I had a stream from my swede paddock going into
   the creek running over a riparian strip of 18 metres. That day the province was awash!
3 An auditing regime where costs are passed back to farmers will further damage the councils
   reputation and deplete the environmental benefits
Intensive winter grazing
Oppose - Complete shambles of drafting this rule.
Reasoning
1 Stock have to be wintered somewhere
2 Focus on Good management practice in farm plans
3 Could be a debate for the catchment limit setting process when a more fine grained approach will be carried out on your catchment water quality issues, possible solutions and economic costs of any change (Southland Economic Study).
4 Minimum set back of 3 metres worked well but new setback under vii makes no common sense
Decision – Remove area criteria and rethink setback distances as not currently practical

Cultivation on sloping ground
Oppose (a) Setback distances and steepness of cultivation
Reasoning
1 Difference from 3 degrees to 4 degrees is 7 metres extra setback and is an office problem to a practical farming issue.
2 I have heard many farmers recently talk of cultivating land much steeper than 20 degrees with no adverse effects.
3 Productivity of some farms could drop significantly where there would have been no environmental issue
4 Very subjective as to degrees and setback
Decision – Rethink setback distances and steepness of cultivation.

Closing Remarks
I was involved in the original water plan which was worked through in a way where we focused on the activity before drafting rules. With this being an update of all those rules and the lack of practical input evident with the rules in front of us and not highlighted for easy reading. I reserve the right to comment on any sub clause in any rule which I have overlooked in my verbal submissions.

I also look forward to a proper process for the catchment limit setting process where the problem is defined clearly and time taken for all to understand before making decisions on a way forward. Both urban and rural effects must be looked at something lacking in this document. Where there is change needed then time must be allowed for the transition. We must not pit one farmer against another or urban against rural.

The future of this province depends on that.

David Rose
August 1 2016