28/7/17

**Submissions on parts of Water and Land Plan**

**Rule 20**
The definition of “intensive winter grazing” and how it applies to land holdings need a much more definitive explanation.

May to September is definitive but the definition of forage crops needs expanding. I presume you mean brassica and beet varieties. Technically speaking, forage crops cover anything animals eat, including perennial pastures.

How this rule applies to farms with multiple physiographic zones needs to be clearly defined. I am hoping what you mean is that each zone is governed by the relevant rules and not that the predominant zones takes precedence.

If this is in fact the case, procedures and costs for consents will likely be prohibitive.

**Rule 23**
The 20ha and 50 ha limitation is unrealistic given the scale of many Southland farming operations and restricting increases by using a three year rolling average does not allow adequate scope for changes in farm policy or development direction. I believe these area restrictions are the total areas for all land holdings under ownership of an entity. This makes the unrealistic nature of the restrictions even more untenable.

I believe that if vegetation offsets and management plans are in place and adequately enforced, then there would be no need for 20ha and 50ha rules. There would be risks of unintended consequences if area rules come into force:

Intensive winter grazing is defined as grazing on fodder crops (this is ill defined) but I presume you mean brassica and beet crops.

The alternative approaches for farmers may be to use high yielding grasses boosted by autumn nitrogen to fill winter feed gaps. This approach comes with its own set of environmental issues which could be worse than exceeding the area restrictions.

Possibly this would an incentive to look closely at Fodder Beet harvesting with feeding Beet on pads. Do the vegetation off set rules apply to harvested Fodder Beet areas?

A fundamental issue here is that I don’t think that regulating negative effects on water should be done via prescriptive rules about what you are allowed or not allowed to do. Rules can be put in place e.g.
offset rules, to mitigate expected effects, but rules limiting the scale of any enterprise should not be applied. Approaching the issue this way avoids large farming operations being unfairly limited. This also means that if this approach was taken, the penalties for exceeding water quality guidelines need to be large enough to encourage the adoption of mitigation strategies.

**Rule 25**
I think the rules related to slope and set backs are reasonable but I think the “once in five years to renew pasture” should also be applied to 20\(^0\) slopes.

**Rule 44**
Restricting the use of a dead hole to stock derived from the same landholding is unnecessary. This will restrict smaller holdings that often currently use a common dead hole.

**Rule 70**
While fencing of water ways is a laudable target for all stock, the financial imposition for most properties, but particularly hill country properties, will be unmanageable unless time frames for fencing are significantly extended and/or financial support to fence is available.

I suggest a twenty year time frame should be applied with a plan put in place for this period which prioritises the risk factors.

A clear indication of time frames for sheep exclusion, if this is envisioned, must be given now. This will give farmers a clear signal as to fence design required. We must avoid having to tackle fence lines twice, once to exclude cattle and again if sheep exclusion is required.

I also suggest that, because of the convoluted course of many water ways, significant land areas will be lost. This supports the notion of financial support, perhaps along the lines of a rates rebate to support and encourage fencing.

Is there scope to consider the enhancement of wetlands to act as filters for waterways that are just not practical or too costly to fence off? I believe this would be a palatable option for farmers.

These are the issues that currently occupy my thinking about my client base of sheep and beef farmers. I believe most farmers fundamentally agree with the objectives of the Water and Land Plan, but Environment Southland must continue to take a pragmatic approach to achieving these objectives. To succeed you must take the farming community with you because it’s the farming community that will make this plan succeed.

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