Environment Southland

Southland Water + Land Plan Submission from:

Rimu Grasslands Ltd and Leicester Downs Ltd

Written By
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INTRODUCTION

I am writing today because I believe the plan as it stands will have a significant effect on not only our property but for others who farm as we do. I am seriously concerned about the Plan and how it will affect our future and other farming generations to come.

My father owns a 200 Ha property at Otahuti which my wife and I lease. This sheep and beef farm has been in the family 45 years. The physiographic zones through this property are as follows:
- 3/5 Central Plains
- 1/5 Oxidising
- 1/5 Gleyed

We also own 120 Ha at Fairfax. We purchase this block 9 years ago and is farmed as a mixture of sheep and heifer grazing. The physiographic zones through this property are as follows:
- 2/5 Gleyed
- 2/5 Oxidising
- 1/5 Riverine

We farm to be self sufficient, any surplus feed is utilized in the winter, we have never brought fed in. This philosophy determines the stocking rate, winter stocking rate is around 13.5 sheep/Ha and 2.5 heifers/Ha. We winter our animals on crop paddocks and for the June - August period, we typically need around 10% of the farm in crop.

The Otahuti property has 4 creeks/rivers running through it with the Waimatuku River being the most significant. Total river bank length on this property is 8.7km of which 1.5km remains unfenced. Around half the paddocks boundary a waterway and due to the low lying nature of the property tile drains are used.

The Fairfax property has 3 creeks/rivers with the Aparima River being the most significant. Total river bank length on this property is 5.5km of which 2km remains not permanently fenced. 75% of paddocks boundary a waterway and there are very few tiles for drainage.
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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 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: (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.
General Comments on Plan
This plan seems to be focused on farming practices. Water quality should not be just about farming practices yet this plan would indicate otherwise.

The plan imposes detail on many farming activities; some detail is very subtle it is hard to fully understand how this will impact our farming practice. We have only commented on specific issues that we currently understand. We retain the right to comment on other parts of the plan at a later time as our knowledge of the plan increases (Please note, since this document has been released, the lack of education from Environment Southland has been very noticeable so it has been very hard to draw balanced conclusions on what is intended).

There are many costs associated with the policies and rules of this plan, some parts will not be cheap to implement as well as our own costs in lost production and opportunity.  
- There has no indication on consent costs and no indication of how the plan is to be enforced. Last year, the high price for the well-publicized dairy farm consent in Waituna is unacceptable.
- How is Environment Southland going to work through the wave of consents that are to be created? If you cannot process consents in a timely manner, any good done will by applicants will be lost.
- If you take on more people you need more revenue. Rates are increasing well above inflation now and I’d hate to think where this could go.

Specific Comments on Plan

<table>
<thead>
<tr>
<th>Objective 2</th>
<th>✓ Support □ Oppose □ Amend</th>
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<tbody>
<tr>
<td></td>
<td>Reasons: Water and land, our economy, our social and culture wellbeing are all inter connected and they are all as important as each other.</td>
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<table>
<thead>
<tr>
<th>Policy 37 Climate Change</th>
<th>□ Support □ Oppose ✓ Amend</th>
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<tr>
<td></td>
<td>Reasons: I’ve seen one example of a project in North Otago to improve water quality from an effluent discharge which involves an industrial process using a significant amount of electricity. The quality of the discharge is now better then the stream receiving the water yet I’d argue the fossil fuels used in the creation of the electricity have done more harm to the environment.</td>
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<td></td>
<td>Move this Policy up into top 5 Policies.</td>
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<table>
<thead>
<tr>
<th>Physiographic Zones Policy 5 Central Plains</th>
<th>Policy 6 Gleyed</th>
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<tbody>
<tr>
<td>✓ Support ✓ Oppose □ Amend</td>
<td>Policy 10 Policy 12</td>
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<tr>
<td>I like the idea of physiographic zones but I can’t support these polices. I do not understand how the zones were allocated in our area. To base many policies and rules on this work without including farmers in the science has</td>
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<tr>
<td>Explanations on how physiographic zones are allocated need more community engagement. Farmers need a procedure to challenge Zones for their land.</td>
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been incredibly short sighted. There is too much at stake to base this plan on science which will only be proven over the coming years.

**Policy 16**  
Farming Activities that affect water quality

**Rule 20**  
Farming

**Rule 21**  
Existing Dairy Farming

**Rule 22**  
New/Expanded Dairy Farming

**Appendix Q**  
Sensitive Water bodies

- **Support**  
- Oppose  
- Amend

**Reasons:**
Policy 16 “strongly discourages” establishment of new dairy farming. Rule 22 has been structured to support this.

Although Rule 22 does not “prohibit” new dairy farming on Gleyed/Oxidising/Central Plains physiographic zones, the cost to comply with this rule certainly will. It is most concerning that Waimatuku Estuary has been included in Appendix Q, we do not understand why?

Rule 20, Rule 21 and Rule 22 together will create an uneven playing field for different farming practices within the same catchment especially if a sheep farmland can no longer be converted to dairying. I interpret these rules as: “it’s OK to farm as you do now, but it’s not OK to change”. The worst economic impact of this imbalance will be past to those farmers who are not dairying. The social effect for these farms could well be devastating.

Yet, it is not future development which has added nutrient loading to our catchment; it has been past farming development, more to the point “it is NOT OK to farm as we do now”. Any restrictions put on future development also need to be placed on past development. It is only then water quality will improve (Objective 8). It is UNFAIR to restrict future development on past excesses. Future development is great for our economy and there needs to be a way for this to continue.

Section 32 6.3.1.1 indicates a stock unit rises, year on year, between 1992 and 2015 as 30k to 40k. Although we have more productive pasture to feed this increase in stock, I believe our farming systems are now reliant of additional feed from off farm. This supply of additional nutrients needs to be controlled, yet there is no restriction in this plan.

Rule 20 defines how non dairy farming is a permitted activity. Rule 21 defines how dairy farming is a permitted activity. Rule 22 defines how new dairy farming is a discretionary activity.

They should all be defined as the same, they should all be permitted, or they should all be discretionary.

Target the movement of supplementary feed onto farm.
| Policy 40  
| Determining the term of resource consents  
| Section 4.  
| | ✓ Support ☐ Oppose ☐ Amend  
| Reasons:  
| Although this policy concerns the Term of Resource Consents, the recognition of “capital investment” is important, especially coming from Environment Southland. The only down side is that capital investment is not mentioned more in the plan.  
| |  
| Policy 46  
| Identified FMUs  
| | ☐ Support ☐ Oppose ✓ Amend  
| Reasons:  
| Identification of FMU’s is very poor. The physiographic work has shown a high diversity of zones across the province. Dividing this into only 5 FMU’s is too simplified. It is also not clear where the Waimatuku Catchment would fit into this definition.  
| Please sub-divide these zones. If I consider the Aparima FMU I would at least break this into:  
| - Headwater  
| - Upper Aparima  
| - Lower Aparima  
| - Coastal Aparima  
| |  
| Rule 13  
| Discharge from installed subsurface drainage systems  
| | ✓ Support ☐ Oppose ☐ Amend  
| Reasons:  
| Much better effort than the draft plan. Consideration must be given to how tile cleaning can continue.  
| |  
| Rule 23  
| Intensive Winter Grazing  
| | ☐ Support ✓ Oppose ☐ Amend  
| Reasons:  
| The 20Ha/50Ha only restricts sizable farms and this is unfair, we all have to find solutions for winter grazing. In Section 32 6.3.5, Objective 2 is used to support the 20Ha/50Ha restrictions by limiting the number of consents, yet surely the number of consent is irrelevant of improving water quality Objective 8.  
| We supported the draft plan of wintering area based on 15% land area.  
| |  
| Rule 25  
| Cultivation on sloping land.  
| | ✓ Support ☐ Oppose ☐ Amend  
| Reasons:  
| On the whole this is a big improvement of the draft plan. Very pleased to see Section (b), this now makes this rule practical.  
| We can’t support Section (a)-(i)-(3). I simply do not understand 16 degrees averaged over 20 metres, and do not support the consent requirement for slope over 20 degrees in the middle of the paddock.  
| Please redefine (a)-(i)-(3). 16 degrees seems to low to be practical. Remove consent requirement for land over 20 degrees in the paddock.  
| |  


<p>| Rule 26 | Discharge from on-site wastewater systems. | √ Support  □ Oppose  □ Amend | Reasons: Much better effort than the draft plan. |  |
| Rule 32 | Effluent Storage | □ Support  □ Oppose  √ Amend | Reasons: Although this has no effect on our farm to date, I believe a stock underpass would be of great value to our property. The available locations are limited on our farm, all possibilities are within 50 metres of a water way. I’d expect the underpass to fill with water and this would need to be removed and stored. The definition of effluent storage and corresponding limits are far too generic. | Redefine effluent storage. Use limits more appropriate to storage size. |
| Rule 35 | Discharge of agricultural effluent to land Appendix P Effluent drop test methodology | √ Support  □ Oppose  □ Amend | Reasons: Although we are not dairy farmers, even we can see Section (b)-(iii), in particular Appendix P, as completely impractical. There will be few days in Southland when testing is possible and how many dairy farms need testing? | This needs rewritten. |
| Rule 37 | Agricultural dips | √ Support  □ Oppose  □ Amend | Reasons: Portable dipping is very important process for maintaining the health of sheep. It is very important this remains a permitted activity. |  |
| Rule 44 | Dead holes (offal pits) | √ Support  □ Oppose  □ Amend | Reasons: Very important farming feature. This needs to remain a permitted activity. |  |
| Rule 49 | Abstraction, diversion and use of surface water | □ Support  □ Oppose  √ Amend | Reasons: Putting a maximum water take limit per landholding is illogical. Surely the maximum limit should be proportional to the size of landholding. | Relate the maximum limit to landholding area. |
| Rule 59 | Culverts and Sediment Traps | □ Support  □ Oppose  √ Amend | Reasons: Sediment traps are defined as less then 2.5m squared. This may be satisfactory for small rain events but will be completely inadequate for normal rain events. | Remove this restriction, or if this is really needed make it bigger. |</p>
<table>
<thead>
<tr>
<th><strong>Rule 64</strong></th>
<th>Temporary canoe gate or ski lane markers</th>
<th>√ Support  □ Oppose  □ Amend</th>
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<tbody>
<tr>
<td>Reasons:</td>
<td>I like this, great sport. More people should participate.</td>
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<td><strong>Policy 18</strong></td>
<td>Stock exclusion from water bodies</td>
<td>√ Support  √ Oppose  □ Amend</td>
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<tr>
<td><strong>Rule 70</strong></td>
<td>Stock exclusion from water bodies</td>
<td>Reasons:</td>
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<tr>
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<td>We support the policy and rule as long as long as sheep remain excluded from the rule.</td>
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<td></td>
<td>I can’t support Rule 70 (a)-(vii). If deer had a natural environment it would be hill country. It is impractical to expect these farmers to deer fence stock from all water ways. If access could be gained to the water bodies for the purpose of deer fencing, the standard of fence could never be good enough without causing other environmental damage.</td>
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<tr>
<td><strong>Rule 78</strong></td>
<td>Weed and sediment removal for drainage maintenance</td>
<td>√ Support  □ Oppose  □ Amend</td>
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<td>Reasons:</td>
<td>This is a very important practice to stop rivers natural damming and must remain a permitted activity.</td>
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<td><strong>Appendix N</strong></td>
<td>Management Plan</td>
<td>√ Support  □ Oppose  □ Amend</td>
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<td>Reasons:</td>
<td>Management Plans are a good idea. They will educate and provide clear direction to all farmers on issues to do with water quality. Only down side, who is going to provide the thousands of Plans required and at what cost?</td>
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<td>I’m confused, Land Sustainable has already completed a Focused Farm Plan on our farm, yet there are sections in Appendix N which were not covered. Is our Focused Farm Plan irrelevant and will it need rewritten?</td>
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<td><strong>Glossary</strong></td>
<td>□ Support  □ Oppose  √ Amend</td>
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<td>Reasons:</td>
<td>Intensive winter grazing refers to “fodder crops”. What are “fodder crops”? RMA definitions – include the definitions for waterway, lake, ephemeral waterway.</td>
<td>Add a fodder crop definition.</td>
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<td>Implementation</td>
<td>No information is provided on costs and processes for implementation. Timelines and compliance implications are unclear.</td>
<td>Release an implementation plan that details this information prior to making rules operative.</td>
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<td><strong>Section 32 report</strong></td>
<td>Section 32 identifies and assesses costs and risks of new policies and rules. On policies that appear in the plan, some of these costs and risks on farm are as significant as the water quality benefits. I see little consideration in the plan for many of these costs and risks. It would appear this document was created to meet the needs of the RMA, and any real benefit from such a document has been lost to the bias opinion in Environment Southland that farming needs to be discouraged.</td>
<td>Make changes as recommended above based on information that is in the s.32 report.</td>
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