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.

Full Name: Ross Keith Bowmar
Organisation*: the organisation that this submission is made on behalf of
Postal Address: 46 Wilson Road, RD1 Wyndham
Email: ross.bowmar@gmail.com

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Phone (Wk): 0275288525
Phone (Cell): 0275288525
Postcode: 9891
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: [Signature] Date: 30 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
<table>
<thead>
<tr>
<th>The specific provisions my submission relates to are:</th>
<th>My submission is that:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Specify provision number and title, e.g. Policy 17 - Effluent management)</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>
</tr>
</tbody>
</table>

**EXAMPLE**

Appendix G

- Support [ ]
- Oppose [ ]
- Amend [ ]

Reasons:

**EXAMPLE**

Popular bathing sites should include Makarewa River at Wallacetown.

**EXAMPLE**

Appendix N

- Support [ ]
- Oppose [ ]
- Amend [ ]

Reasons:

A farm management plan should not be required due to the additional constraints and cost this imposes on businesses. I do not personally know any farmers who do not take the environment into consideration to ensure the longevity of their farming business and hence the requirement for an annual management plan is redundant.

Furthermore, these plans will be very time consuming for the Southland Regional Council to manage and monitor. How many additional staff will it require to read and respond to all management plans? How will this be funded? What are businesses expected to do if the plan causes delays that impact their business?

How does the 21HA farm absorb the costs the same as the 1,000HA farm? Given the requirements are the same.

**EXAMPLE**

Nutrient Budget

- Support [ ]
- Oppose [ ]
- Amend [ ]

Reasons:

The divide between poor and good. Picture two farms side by side, one intensive farming the other extensive. Under the plans the restrictions on future options are much greater for the farm with the lower nutrient budget profile today. Accordingly, any future options will be more limited for that farm. Accordingly, this creates uneven future opportunities.

**EXAMPLE**

Removal of the requirement for all farms over 20HA to produce annually a management plan. Provide information on the transactional (overhead) cost associated with implementing and monitoring this plan. This will allow rate payers to make better informed decisions.

**EXAMPLE**

Set all nutrient budgets levels at the level of the most intensive practice. This creates a fair future opportunity for all land owners.
<table>
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<tr>
<th>The specific provisions my submission relates to are: (Specify provision number and title, e.g. Policy 17 - Effluent management)</th>
<th>My submission is that: (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.)</th>
<th>The decision I would like Environment Southland to make is: (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.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Riparian Plan</td>
<td>☐ Support ☐ Oppose ☐ Amend Reasons: In some areas, fencing that restricts stock access is simply not possible. Either due to flooding causing continual loss or damage to fences. Or due to the area being too steep and impractical to fence off.</td>
<td>Any riparian management plan should say where practical in relation to fencing off waterways. Where the practical is determined by the landowner.</td>
</tr>
<tr>
<td>Riparian Plan</td>
<td>☐ Support ☐ Oppose ☐ Amend Reasons: Amend access to waterways for maintenance purposes. Often this maintenance leads to increased erosion. An example being the removal of willows which accelerates the river speed resulting in increased erosion and loss of native vegetation. Furthermore often these activities occur in winter leading to a lot of mud, so the landowner should have discretion over access.</td>
<td>Any modification to the river channel should be in consultation with the landowner and not a given right for Environment Southland to make changes.</td>
</tr>
<tr>
<td>Cultivation</td>
<td>☐ Support ☐ Oppose ☐ Amend Reasons: No farmer wants their stock in the middle of winter wandering through creeks creating mud. However, the requirements around buffer strips are impractical, how does one decide what the slope is? On a single waterway, at one point the slope might be 2 degree's and 10 meters away 20 degrees.</td>
<td>One distance of 3M for all waterways and not ambiguity created by having differing buffer strip distances.</td>
</tr>
</tbody>
</table>

Add further pages as required – please initial any additional pages.
The Specific Provision my Submission relates to are:

Appendix N - 7. Cultivation (a)(ii)(4) – as specified in resource consent conditions where the slopes are greater than 20 degrees. Relates to Rule 25 as well.

My submission is that:

Oppose – The cost and time involved in obtaining a resource consent makes this practice unviable. It would seem that the assumption has been made that the entire hill side will erode into the waterway ......I doubt you can present one farmer that thinks that is acceptable. Accordingly this requirement is redundant.

The decision I would like Environment Southland to make us:

Completely remove the requirement for a resource consent for cultivating land greater than 20 degrees.

The Specific Provision my Submission relates to are:

Appendix N - 7. Cultivation (a)(iii) – Land where cultivation is planned over the next period 1 June to 30 May. Relates to Rule 25 as well.

My submission is that:

Oppose. Not everyone knows where cultivation will occur next summer. Depending on the winter and spring this can have an influence over the decision of what area to cultivate. For example market economics change so the farmer decides to put in more crop to winter increased stock numbers.

The decision I would like Environment Southland to make us:

Completely remove the requirement for a cultivation map.

The Specific Provision my Submission relates to are:

Policy 16 – Farming activities that affect water quality (1). Relates to Rule 21 as well.

My submission is that:

Amend. Either farms should be allowed to carry out the most intensive activity in the area or they should not. Rather this reads that those who are the greatest contributors can continue but those nearby farming less intensively will not have the same opportunities. This increases the likelihood of increased inequality between neighbouring properties.

The decision I would like Environment Southland to make us:

Either allow intensification or you do not. The intensification is determined by the maximum intensification in the region in the question. If the maximum level needs reduced then this should be phased in.

The Specific Provision my Submission relates to are:
Policy 16 – Farming activities that affect water quality (2)

My submission is that:

Amend. Remove compulsory Management Plan requirement. This is too costly for many farms to absorb. And no details given as to the transactional cost this will create for Environment Southland. I.e. What is the overhead cost of this program?

The decision I would like Environment Southland to make us:

Make a management plan optional.

The Specific Provision my Submission relates to are:

Policy 16 – Farming activities that affect water quality (2)

My submission is that:

Amend. The maps on physiographic zones on a regional scale are ambiguous at best and confusing at worst. Furthermore, looks like some boundaries divide properties which would further complicate any planning requirements.

The decision I would like Environment Southland to make us:

Identify to all farmers the implications for their properties and then recall for submissions on this plan. Only once farmers know the impacts on their business and livelihoods will they be best situated to respond. Accordingly, I feel Environment Southland needs to spend at least 4-5 years providing information about physiographic zones and properties of each. This should include visiting each property …as this will identify if the plan is actually practicable without causing significant economic hardship.

The Specific Provision my Submission relates to are:

Land Use Rules – Rule 20 – Farming

My submission is that:

Oppose. This reads that farming will be a non-permitted activity. Which would mean that a resource consent is required. What is the cost and timeframe for these to be turned around? How is a 101HA farm to absorb this cost?

Furthermore, I expect many landowners are not aware of when their property would be impacted by these proposed rules. As classification is not clear.

The decision I would like Environment Southland to make us:

Spend 4-5 years discussing with farmers the impact on their individual farming business. While larger farms will be aware of all the requirements the smaller substance farmer will not and is likely not
engaged in this process. Once the landowners are truly aware of the impact then Environment Southland will get a more inclusive response.