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: Stephanie Paterson  Phone (Hm): 0329272510
Organisation*:  Phone (Wk): 
* the organisation that this submission is made on behalf of
Postal Address: 162 Greenvale School Rd  Phone (Cell): 0275674424
RD5 Gore  Postcode: 9775
Email: stephandross@hotmail.com  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 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: Stephanie Paterson  Date: 30.07.2016
(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.
The specific provisions my submission relates to are:
(Specify provision number and title, e.g. Policy 17 – Effluent management)

<table>
<thead>
<tr>
<th>Provision</th>
<th>Support</th>
<th>Oppose</th>
<th>Amend</th>
<th>Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy 18 (1)</td>
<td>☐ Support</td>
<td>☐ Oppose</td>
<td>☑ Amend</td>
<td>Reasons: I support the decision to exempt sheep from this policy. Fencing out sheep aswell would require 6 wire fences and would prove to big and costly an undertaking, especially considering sheep naturally don't even like water and will naturally tend to avoid it.</td>
</tr>
<tr>
<td>Rul 23 (b) (iv)</td>
<td>☐ Support</td>
<td>☐ Oppose</td>
<td>☐ Amend</td>
<td>Reasons: I don't believe it is reasonable to impose blanket thresholds for winter grazing, even with the way it has been broken up there are to many variables to factor from farm to farm and this policy change is one that will drastically change the way we farm and have farmed for the past 100 years, without any proof that it will have any impact on any water quality. As we are going to be required to implement a farm management plan anyway, i believe it is possible to come up with figures appropriate for each individual farm based on good management practice.</td>
</tr>
</tbody>
</table>

Please retain this policy as is. The cost of fencing out sheep permanently would be prohibitive, and I believe unnecessary. Good farming practice would mean that temporary tapes could be set up to keep them out of streams in high risk situations where it was deemed necessary.

This needs to be managed in accordance to the management plan prepared for each individual landholding and monitored and adjusted accordingly through recording and water testing where it exits the farmland. I think this solution needs to be a collective approach of individual efforts and doing the best we can to take responsibility for the water on our own properties, but not an average approach across the whole region which would potentially see us penalized for others shortcomings.
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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>
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| Rule 23 (b) (vii) | ☐ Support ☐ Oppose ☐ Amend
Reasons:
I support vegetation strips but these proposed minimums are too extreme. The loss of usable land comes at a very high cost when higher density planting and good management practices could have the same effect in minimising contaminants in a smaller strip. | ☐ Support ☐ Oppose ☐ Amend
Reasons:
3 meters up to 16 degrees >16 degrees would require more. Take care and use good management to ensure careful grazing of the areas closest to waterways. |
| Policy 18 Stock exclusion from waterways | ☐ Support ☐ Oppose ☐ Amend
Reasons:
Who is responsibility is it to maintain fenced waterways. Land is still rated to the landowner yet unable to be grazed. Significant spraying and planting costs will be imposed upon landowners for areas they have no control over. | ☐ Support ☐ Oppose ☐ Amend
Reasons:
Environment Southland should look into some form of subsidising for these areas. Perhaps subsidising native plants etc. |
| Definition of Forage Crops | ☐ Support ☐ Oppose ☐ Amend
Reasons:
The stated definition of forage crops is very wide and open ended and should be better defined. | ☐ Support ☐ Oppose ☐ Amend
Reasons:
Define forage crops as swedes and beets etc. |

Add further pages as required – please initial any additional pages.
### The specific provisions my submission relates to are:

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### Policy 38 Natural Hazards

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<tr>
<td>Reasons: I am fully in favour of the policy decision allowing farmers the ability to undertake cultivation and modifications to protect staff &amp; contractors. For example, cultivating benched ground that has been cultivated previously.</td>
</tr>
</tbody>
</table>

### Definition of "Lake"

<table>
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<th>☐ Support ☐ Oppose ☑ Amend</th>
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<tr>
<td>Reasons: Define a Lake as a lake. Duck ponds and man-made wetland ponds should not fall under the the same definition of Lake.</td>
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</table>

### Appendix G

<table>
<thead>
<tr>
<th>☐ Support ☐ Oppose ☑ Amend</th>
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<td>Reasons: Popular bathing sites should include Makarewa River at Wallacetown.</td>
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### Form 5: Submissions on a Publicly Notified Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

The specific provisions my submission relates to are:

(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.)
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| ☐ Support ☐ Oppose ☐ Amend |

**Definition of Cultivation.**
- The definition of cultivation should be limited to mechanical cultivation. As it is written it removes the ability to spray gorse and broom which are on the Environment Southland noxious weeds list.

**Definition of "Intensive"**
- I am unsure what is considered intensive in Environment Southlands eyes. Is it only on crops, or does it also include block shifts on grass. We do not bring in any extra stock to winter feed, but must be able to provide sufficient feed for the stock we have which already proves difficult most years with Southlands winter conditions.

**Physiographic Zones**
- I’m glad to see that work has been done to differentiate zones, but still think that they are too broad as there are so many variables that should be considered before imposing rules on landowners such as their proximity to major waterways, and extent and positioning of water courses within the farms themselves. As far as i’m aware there has been no testing or work carried out in our district.

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Add further pages as required – please initial any additional pages.
**Continue on additional pages if necessary. You are not limited to the spaces provided.**

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<td>Appendix G</td>
<td>EXAMPLE</td>
<td>Popular bathing sites should include Makarewa River at Wallacetown.</td>
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</table>
| Rule 25a (i)  
Cultivation on sloping ground | ☐ Support ☐ Oppose ☑ Amend  
Reasons:  
These set backs are too large resulting in too much lost grazing area. | 3m <16 degrees and greater over this angle  
Stock can be kept back further through winter. |
| Rule 25a (ii) | ☐ Support ☐ Oppose ☐ Amend  
Reasons:  
The 20 degree proposed ruling would take out nearly 50% of our farm. This would force us to intensively winter closer to main water courses and reduce the ability to pick up any losses within farm. The slope of the land should not impact so long as setbacks are used | 30 degrees at the very least.  
All land cultivated in the past should be permitted to be cultivated in the future. Setbacks and good management to be used and not cultivated more than 2 years in a row. |
The specific provisions my submission relates to are:
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<th>Objective 19 (missing from policy)</th>
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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.)

Please establish an objective that aids farmers so that we can all work together to an end goal.

Add further pages as required – please initial any additional pages.
I don’t think that the creation of this plan has properly taken into consideration the serious financial implications that these proposals will have on farmers in the region, or considered the resulting onflow effect that will ripple through the businesses that service them.

I am certainly not opposed to the fact that we need to work together to improve water quality and protect our environment, but a more measured approach needs to be taken to also protect the businesses and livelihoods of farmers and all the businesses that rely on them within this region.

I cannot stress enough how important it is for Environment Southland to work with farmers now to create manageable and actionable plans for how this can work for everyone on a case by case basis rather than taking the one size fits all approach. Use your resources to educate landowners and teach good management practices that can be implemented instead of using your resources to create rules and enforce them.

Some of the proposed rules will result in huge portions of land (anything steeper than 20 degrees apparently) being rendered basically worthless, and proposed cropping rules would force de-stocking so that we would lose a percentage of our already unstable income that will be desperately needed to service the high debt owed to the bank for the premium priced now unworkable land.

Selling this land won’t be a viable option as no-one else will have a use for land they are not allowed to work up and so we will sit and hope for lamb prices to go up as we watch our investment blocks turn back to gorse and broom. Budgets will be tightened so the local contractors will be the first to go, Farmlands, PGG Wrightsons and Fonterra will feel the pinch too, local salt, seed and fertilizer companies will have to tighten their belts, and any luxury spending through Gore and Invercargill will have to be cut so that we can spend any money we might have left at the supermarkets. You can bet that the food budget will be bare necessities though. OK though, because there are still all the town folk to keep some of those businesses going .... Until jobs start getting lost and then they will have to cease all unnecessary spending as well. Things are looking great for the region by this point.

My suggestion is that we need to find a solution that allows landowners to control and protect the waterways on their land through a monitored and well implemented farm plan and code of best practice. If we can fence our creeks and plant enough vegetation to filter the runoff then we should be permitted to farm in accordance with our own farm plan that sees us working to meet a measurable water quality by the time our waterways exit the farm. On our property this would mean continuing to work and crop on some of our steeper blocks at the back of the farm, allowing us greater control to filter the water through vegetation down the length of our farm should any excess runoff occur. With the proposed changes we would be forced to intensively farm all our flattest land which also happens to be the last source point before the water leaves our farm, leaving us no control to filter the water before it is out of our hands. This flat land also becomes much more prone to waterlogging and overflow than much of the rest of our property and would pose a much greater threat to water quality than our current practice would if given the chance to maintain it and invest our resources in planting out the waterways instead of fighting beurocracy.

As part of the proposal Farm Management Plans are going to be mandatory anyway, so why not shape the policies to fit them better. I sincerely hope that there is a great deal of reshaping done to this plan so that it can work for everybody and not cripple our farming operations.

Yours hopefully,

Steph Paterson