

Submitter No: 186

Submitter Name:

DR & JAE Pullar Ltd

## **Comments to Evidence Land and Water Plan**

Date Received: 14/6 /17

My name is David Pullar. I am a director of DR and JAE Pullar Ltd, our family farming company. I wish to make a number of comments in support of our submission and the evidence presented to support that submission.

DR & JAE Pullar Ltd farms sheep and angora goats on two properties totalling 268 hectares carrying 3000 stock units at Speden Road and Mountain Road, Kaiwera. The business is operated by my wife and myself with minimal use of additional labour or contractors. The farm at Speden Road has been farmed by four generations of our family. We have a strong connection to this land and this place. In saying that I acknowledge those whose attachment to this land goes back much further than ours.

### **Comments on the Plan with respect to sheep farming.**

Our submission and evidence strongly supports the general approach taken by the plan in managing sheep around water bodies. We have provided some detail around the impacts that a total exclusion of sheep from water bodies would have on our business and our lives should you be of a mind to require a total exclusion of sheep. In particular consideration should be given to the

effects on water of any alternative land use if sheep farming economics is undermined by the requirements of the plan.

The most likely alternative land use for us is cattle farming. The nutrient losses resulting from a cattle system for our property are likely to be considerably higher because of the greater area of winter crop required, but fencing water bodies would be a lot easier and cheaper. It appears that such a system could be accommodated by the plan without requiring consent.

I ask you to note the nutrient losses produced by our current farming system. I suggest that these are at the lower end of the scale relative to more intensive farming systems. I suggest that the additional benefits from total exclusion of sheep from water bodies in our situation would be minimal. Please note that there is existing riparian vegetation as shown by the photographs attached to the evidence. All of this has been maintained and enhanced without permanent fencing.

### **Rule 23 Intensive winter grazing rule**

We have concerns regarding the fairness of the area based trigger for consent for intensive winter grazing. This approach is not effects based and places an unreasonable burden on larger land holdings. It does not conform to the principles of natural justice. It ignores the cumulative effects of, for example, a number of smaller properties in close proximity within a catchment that can all carry out up to 50 hectares of intensive wintering without the oversight of the consent process. We consider that the trigger for requiring a consent should be based on the percentage of a landholding that is used for intensive wintering.

### **Rule 25 Cultivation on Sloping Ground**

We have noted in the evidence submitted the issues that will arise in relation to weed control by spraying on slopes over 20 degrees particularly in relation to establishing tree crops. We consider that broad area spraying of slopes over 20 degrees for control of weeds listed in the Regional Pest Management Strategy should be able to be carried out without requiring a consent under the cultivation rule.

## **Comments on the Section 42A report.**

### **E coli**

The report suggests that exclusion of sheep from waterbodies should be required where E coli levels exceed those set out in the National Objectives framework. We consider that this approach should only be taken where sheep are shown to be the major contributor to the breach of these levels. As a general principle, the sources of E Coli should be identified before any action is required. There is no point in requiring mitigation measures to be taken if the source of any breach of the National Objectives framework levels is not identified.

## **Critical Source Areas**

We agree with the Section 42A reports comment with respect to the uncertainty relating to the definition and identification of critical source areas. This uncertainty will result in disputes relating to the identification of critical source areas. This will result in land users being in breach of the plan requirements and potentially subject to enforcement action. The plan requirements should be able to be easily understood by landusers. You should consider how a disagreement over whether or not a piece of land is a critical source area between a landholder and Environment Southland will play out. This level of uncertainty places landholders in a very vulnerable position and will do nothing to foster good relationships with ES. We consider that the most appropriate way to deal with this matter is to remove critical source areas from the plan and rely on the proposed setbacks from water bodies as the method for mitigating effects to water from livestock. These are easily understood.

## **Issues relating to Consent Applications**

Finally we noted that in the discussion relating to the proposed 50 hectare restriction for intensive winter grazing, the Section 42A report minimises the

impacts that result from requiring a resource consent. These impacts do not just relate to the cost of the application fees. They also relate to the costs of the preparation of the application, the uncertainty relating to whether or not the consent will be granted, unless it is for a controlled activity, the uncertainty relating to the conditions that may be imposed and any cost of ongoing monitoring required for the consent. We strongly support the proposed use of Farm Environmental Management Plan rather than a consent based approach where ever possible.