

25. copy
Submitter No: 759

Submitter Name: Springlands Group

Date Received: 26/6 /17

BEFORE THE

Southland Regional Council

IN THE MATTER OF

Southland Water and Land Plan

STATEMENT OF Springlands Group Ltd

Date: 26 June 2017

Contact for service:

Name: Gavin Tayles

Phone: 027 430 6893

Email: gtayles@outlook.co.nz

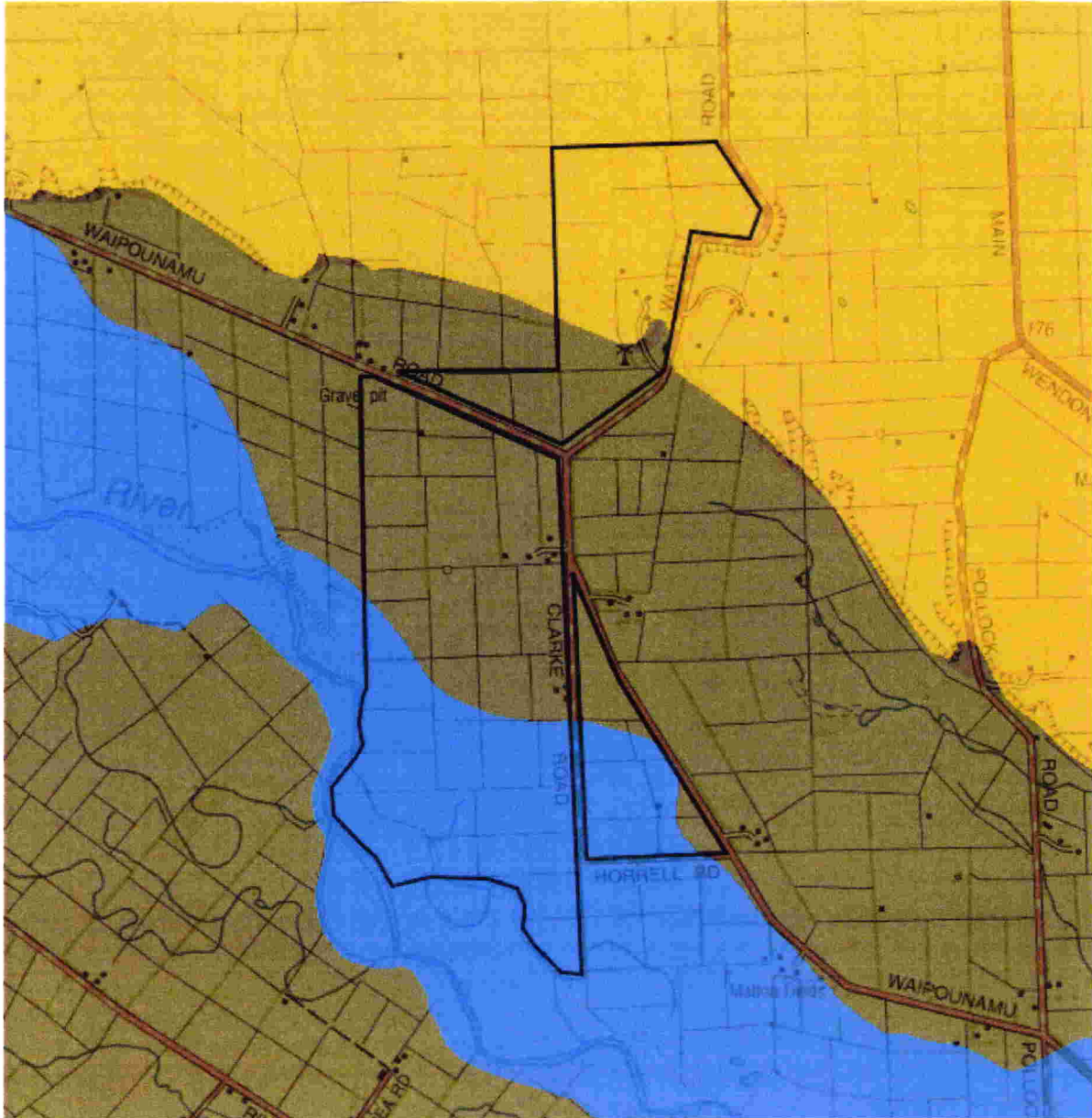
STATEMENT OF Springlands Group Ltd

Scope of statement

1. This statement:
 - a. Introduces my farming business, and the ways that I farm to the natural capability of my property
 - b. Outlines which parts of the proposed Plan will make it difficult to continue delivering these on-farm environmental gains;
 - c. Specifically, I will focus on:
 - i. Physiographic Zones - Policies 4-9
 - ii. Farming - Rules 20-22
 - iii. Intensive Winter Grazing – Policy 16, Rule 23
 - iv. Water Quantity Rule 49, Rule 54
 - d. Outlines alternative ways to better meet the Plan's objectives; and
 - e. Outlines my future vision for my farm

Introduction

1. My name is Gavin Tayles. My wife Kylie and I are shareholders and directors of Springlands Group Ltd . We farm 455 ha in Waipounamu. Our farming operation runs sheep, beef, deer and dairy support.



Map indicating boundaries of which Springlands Group Ltd farms with Physiographic Zones overlaid.

2. Our family has been farming in the area for over 100 years across four generations and we are keen to see the next generation become involved as guardians of the land as previous generations and myself have.
3. We take an inter-generational approach to land ownership and management. Our asset has developed over time and it has allowed our family and others to create a living from the land in that time. It is often portrayed that farms have little regard for the way they treat their land (the environment), which for the minority this could be true, but for the majority

we need to ensure that we farm our land in a way that is going to preserve or enhance the land for future generations.

We have a deep understanding of our land and how to farm it. Physiographic zones do not correspond to how we best manage our land, particularly with grazing of pasture and crops in periods through the winter.

There is an abundance of ground water in the area which is a resource that can be utilized for irrigation of pasture and crops. This provides an opportunity to mitigate the impacts of summer dry periods to ensure that pasture growth can be maximized and stock can be well fed through the summer and autumn. There has been an increase in irrigation in the area over the past 10 years with no detrimental effect on the local environment.

Our property boundaries the Mataura river, which is the only surface water on the entire property. We see the river as an asset that we have been able to enjoy recreationally and wish that future generations can do also. We have excluded stock from the river edges 15 years ago to help mitigate any damage by stock. An impact of the stock exclusion has been the generation of gorse and broom along the river edge, which now requires aerial control with herbicide on a frequent basis to prevent the area being choked with these noxious weeds. As a family we fish, swim, duck shoot and camp at the river. We have no concerns over the quality of the water that flows past our property, however I would not swim in the same river below the Gore or Mataura township.

We continue to hear in the media that New Zealand's water quality is continuing to decline on the back of agriculture, however it appears that the data has been extrapolated or manipulated to create the impression that our waterways are continuing to decline. NIWA data on National water quality indicates Water Quality on average has improved over time. The latest water quality data released from ES and interpreted by independent consultants also indicate that on average the water quality across the region is being maintained or improving. We are concerned that ES is about to make significant changes with the proposed Water and Land Plan which has been created to "hold the line" in respects to water quality. Largely it seems as though we are already achieving this, and the implementation of the Water and Land Plan as an intermediary to the limit setting process is going to have a significant economic cost to the region. We acknowledge that there are further practices that could be implemented to improve water quality in the region but there could be better ways to approach these.

We have a bore on our property that ES has monitored for at least 15 years. Over this time there have been some large fluctuations in nitrate levels and a slight trend upwards in Nitrate levels, however the results that ES has presented to us have always remained under the drinking water standards for Nitrates. There have been some indicators that there is potentially an issue with increasing ground water Nitrate levels in the Wendonside Groundwater zone. Recently a catchment group has been started in the Wendonside Ground Water zone after a discussion with ES science staff indicating that there was less known about the groundwater in the area than previously thought. I am involved with this group to ensure that as a catchment we can accurately assess the current state of the environment against the necessary standards and engage the catchment community to help manage any necessary changes that could be required to sustain or improve water quality in the catchment. I believe that a catchment community lead initiative in conjunction with ES will provide a much better outcome for water quality and economic

benefits for the immediate and wider community in the region than blanket regulation for all aspects of farming.

As a land owner in the "Old Matatura Physiographic" zone we are very concerned around impacts of the land use constraints on the land values in the area. The groundwater zone is not well understood, and we do not have a good data for science based decisions on the state of the water quality or factors impacting water quality. It seems as though ES are looking to impose constraints on the area and region before we know what the nutrient outputs can be sustained at. I believe the community can be much easier engaged by involving them in the limit setting process sooner and having them determine what they need to implement on their land to alter the nutrient outputs to make a difference in their environment rather than imposing conditions, constraints, costs and loss of equity as an interim measure.

Specific parts of the Plan for comment

Physiographic Zones

1. Policy 4-12, There has been no changes to the policies referring to the Physiographic zones in these policies.
2. The physiographic zones have been attempted to be peer reviewed as per the S42a report, but the science is not grounded, yet you are about to create a significant amount of change to the economics of our region before you have a good understanding of what the actual outcome will be.
3. In reference to policy 9.3, I disagree with the wording to "strongly discourage the grantings of consents for new dairy or intensive winter grazing".
4. I believe that this unnecessarily creates undue influence on the council in assessing consent applications when the effects maybe be less than minor with changes in systems, infrastructure or technology.
5. The area where we farm is in the Wendonside groundwater zone, and part of the farm is in the Old Matatura Physiographic zone. The monitoring data in this ground water zone is limited across shallow groundwater, deep groundwater aquifers and surface water. This makes it difficult to determine the current state of the water quality and how nutrients in the groundwater interact in the catchment and downstream as indicated by ES science staff.
6. For the council to base a decision to actively discourage consents for new dairy or intensive winter grazing on this limited data is irresponsible for councilors given that the decision will have a significant impact on land value. If further monitoring data compiled by the newly established Wendonside Groundwater Zone catchment group shows water quality is not of as much concern then the council will be responsible for unnecessarily devaluing land in that area. This approach will damage the ongoing working relationship of farmers in the region. This is not an outcome that I would like to see for more ones than one. ES, council and farmers need to be able to work collaboratively to achieve the best outcomes for the community and the environment. By the response from submissions to the plan it does not seem that there has been positive engagement. Farmers have successfully contributed towards the great province that we have become over the decades, and with the current plan it now seems we are going to be expected to fit criteria which has been set by some have limited understanding of the practical implementations.

7. We recommend the removal of Policy 9.3 whilst further work is completed to establish a better data set in conjunction with ES to help provide a better outcome in the limiting setting process.

Farming

1. From the S42a report Rule 21 now encompasses Rule 22, and as indicated in our response to Policy 9.3 the impacts of restrictions for new dairy or intensive winter grazing referenced in Rule 21 will have large impacts on land value.
2. In the Old Matura Physiographic zone there is only 2% of the land area under dairy, therefore other land uses or natural conditions are potentially contributing to the current ground water nutrient status. Given the low percentage of land use in dairy, a shift to dairy or changes to best management practices in both dairy and/or intensive ~~dairying~~ ^{winter grazing} could quickly have a positive impact on groundwater quality.
3. I recommend that new dairying and intensive winter grazing become discretionary activities in the Old Matura zone and the council base decisions of consent approval on an "effects basis" without any undue influence created by the stigma of a non-complying activity status.

Intensive Winter Grazing

1. Rule 23, changes have been made in the S42a report to remove the 20 ha restriction in Old Matura Physiographic Zone, this is an improvement but retaining a 50ha limit still does not go far enough to create equality.
2. I recommend that the council go to a percentage based threshold for intensive winter grazing for the following reasons,
 - a. Large land owners will not be disadvantaged by a percentage basis.
 - b. Larger farms can sustainably winter crop areas up to 15-20% of the land area, which could be well in excess of 50ha.
 - c. Smaller farms cannot sustainably intensive winter crop areas over 20% but this is possible by cropping up to 50ha.
3. Soil structure is important to soil health, nutrient cycling and nutrient utilization. The ability to continuously intensively winter crop large portions of a small farm will not be able to influenced through a consenting process.
4. We oppose Rule 23 b(vii) the setbacks are potentially at times too restrictive, and with the creation of the rule the farmer will have no discretion to use what is appropriate. The length of the slope leading to the edge and grazing mgmt. will impact on the necessary setback. I think that the Rule 23b(vii) 1-3 from the original plan should be used as a good management guide and it not be created as a rule.
5. We are not supportive of consenting of intensive winter grazing as it will only add further costs to the council and farmers and the outcome will not necessarily improve water quality. I believe that FEMP's would be a better way to encourage best practice where it is not currently being used. The use of FEMP's, and funding into land sustainability advise either from an industry or regional council will be a better way to engage with farms to encourage change where required. Any farms who do not adhere to practices that enhance water quality can be managed by the current compliance rules.

Water Quantity

1. We oppose Rule 49 a(i) as set out in the S42a report as this will place cost on large land owners on extensive hill country properties where gravity water systems feed by surface water takes are utilized.
2. Total surface take of combined stock and domestic takes could easily exceed 40,000litres/day on a larger farm. We suggest that 49 a(i) and 49 a(ii) are rewritten to reflect that stock water and domestic takes are not restricted to 40,000l/day limit.
3. Imposing consents for surface water takes may have a negative impact on encouraging hill country farms to install reticulated water systems which will reduce the need for stock to access waterways on farm.
4. We oppose Rule 49a (vii) and Rule 54 a(iv) as stated in the S42a report, the requirement to meter all water takes above 2000 litres per day is extremely onerous will again create cost which the land holder will have to cover. Cost will be for infrastructure and reporting, which for some hill country takes could be prohibitive depending on location of power sources and telemetry options at the abstraction point. Administration costs will also increase if the data is called upon. We do not think monitoring stock and domestic supplies will have a positive impact on water quality.
5. If the council wishes to monitor the number of surface takes or ground water takes, information could be extracted from FEMP's. If water abstraction points for water takes and stock numbers were obtained then the amount of the take could be easy enough to extrapolate out, rather than all farms over the size of 20-25ha having to have water metering.

Conclusion

1. We need to look after our land and our environment, and largely farmers have been doing this in our region, and this is evident in the latest water quality assessment for the region, observations on management of the water quality in other rural and urban area in New Zealand and abroad.
2. We need to engage all stakeholders in the community rather than continuing to create sectors of the community fighting against each other when generally we want to achieve the same outcome.
3. We need to base our decisions to significantly change farming in Southland on robust data rather than models.
4. We cannot afford to erode value in the regions farmland through policies that are not necessarily going to achieve the best outcomes for water quality.
5. We cannot continue to regulate farming at the cost of economic returns through production loss, exponential increases in administration costs and increasing workload on an administration staffing resources which are already stretched. All need to take responsibility for their own actions to ~~meet~~^{reach} water quality targets which should be determined through the limiting setting process.
6. We must educate all in the community as to what the state of water quality actually is and how they can have a positive impact on it.