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.

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Organisation*: A J & P G Adams
Phone (Wk): 032037228
* the organisation that this submission is made on behalf of
Postal Address: 437 River Road
Phone (Cell): 021980514
RD 2 Gore
Postcode: 9772
Email: p-adams@clear.net.nz
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: _Adams_ Date: 18/08/16

(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
The specific provisions my submission relates to are:
(Specify provision number and title, e.g. Policy 17 – Effluent management)

<table>
<thead>
<tr>
<th>The specific provisions my submission relates to</th>
<th>My submission is that:</th>
<th>The decision I would like Environment Southland to make is:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Appendix G</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>
<td>(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.)</td>
</tr>
<tr>
<td>Appendix N - Management Plan requirements</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**EXAMPLE**

**Appendix G**

- Support
- Oppose
- Amend

Reasons:

- Popular bathing sites should include Makarewa River at Wallacetown.

**EXAMPLE**

- Support
- Oppose
- Amend

Reasons:

- The timing of 1 June is not appropriate because most farms finish their year on 30 June and begin to look ahead after that.
- Plans can change as the year progresses so should be renewable especially for nutrient budgets.
- Our concern is the cost of compliance and the timeliness of receiving a sign off from Environment Southland.

- Plans should start 1 July at the earliest.
- Plans should be as simple as possible and should not result in a large cost to be compliant.
## Rule 25
### Cultivation of sloping ground

- **Support**
- **Oppose**
- **Amend**

**Reasons:**
We have a steep to rolling farm which has all been historically cultivated. If we are unable to cultivate it there will be a major impact on our viability. Having to pay for resource consents will likewise have a detrimental economic impact.

Allow cultivation on sloping ground if it has already been cultivated before. Replace the need for resource consents by determining buffers that are appropriate for each property.

## The specific provisions my submission relates to are:

(Specify provision number and title, e.g. Policy 17 – Effluent management)

- **Support**
- **Oppose**
- **Amend**

**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.)

**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.)

## Policies 4 - 12
### Physiographic Zones

- **Support**
- **Oppose**
- **Amend**

**Reasons:**
I like the science behind the zones but

The physiographic zones map for my property is not accurate/clear enough for us to know where the 3 zones on our farm are exactly.

Provide accurate maps for each farm, take into account varying management and stock types and have an effects based plan, not risk based.

## Rule 23
### Intensive Winter Grazing

- **Support**
- **Oppose**
- **Amend**

**Reasons:**
Winter Grazing

We farm 89 hectares so the 50 hectare limit is practical for us but is not practical for larger properties and would unfairly penalize them. The extensive/high stocking rate is not defined. The winter grazing duration

There should be different definitions for farms who take on extra stock for winter grazing, and farms who graze their own capital stock.

Stocking rates need to be defined

Winter grazing should be June, July and August only.
<table>
<thead>
<tr>
<th>Rule 70 Stock exclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Support  ☐ Oppose  ☑ Amend</td>
</tr>
<tr>
<td>Reasons:</td>
</tr>
<tr>
<td>The time frames for water ways to be fenced are too short. On our farm of 89 hectares we have 1.2 kms of fences to erect at a cost of $21,600 approximately. The cost to do this within the lime frame will have a major negative impact on our profitability and viability as a farming operation</td>
</tr>
<tr>
<td>The extra cost of providing additions to our stock water scheme will also be considerable and will have to be done within the same time frame</td>
</tr>
<tr>
<td>There are also areas on our farm where fencing waterways is inappropriate - it will lead to loss of land and production</td>
</tr>
</tbody>
</table>

There should be different rules for different classes of stock or have an effects based plan instead of risk based

The 50 hectare limit should be the minimum and larger properties should be based on a percentage of the total area of the property

Buffers need to be based on effects not risks

Scrap requirement to map drains and work on effects based plan

The time frame should be extended out to 5 - 7 years

Add further pages as required – please initial any additional pages.