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: Paul Duffy
Phone (Hm): 032468559

Organisation*: 
Phone (Wk):

Postal Address: 
Phone (Cell): 0272885865

Email: paul_alison@farmside.co.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 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: ___________________________ Date: ___________________________

(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.
<table>
<thead>
<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>EXAMPLE Appendix G</td>
<td>☐ Support ☐ Oppose ☑ Amend</td>
<td>EXAMPLE Popular bathing sites should include Makarewa River at Wallacetown.</td>
</tr>
<tr>
<td>Rule 14a ii</td>
<td>☑ Support ☐ Oppose ☐ Amend</td>
<td></td>
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<tr>
<td>Rule 13v</td>
<td>☑ Support ☐ Oppose ☐ Amend</td>
<td>Retain rule however provide a standard map to farmers so information entered will be a consistent quality.</td>
</tr>
<tr>
<td></td>
<td>Reasons:</td>
<td></td>
</tr>
</tbody>
</table>
The specific provisions my submission relates to are:
(Specify provision number and title, e.g. Policy 17 – Effluent management)

| 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.) |

| Rule 20-25 | ☐Support ☐Oppose ☐Amend |
| Rule 20-25 | Reasons: |
| Rule 20-25 | The aspect of these rules that concern me is not so much the requirement for resource consent in some situations but that the consent process is straight forward, simple and not expensive for farmers. It needs to be well explained so farmers can avoid the expense of having to engage consultants. Am concerned at the high test required for land classified as Peat Wetlands. Approximately half of our 174 hectare farm at Otara, currently grazing and wintering cattle is shown as Peat Wetland. That area of the farm also has sand through a lot of that area. Can we have this part of the farm independently analysed and different criteria attached depending on the results found. Non complying is a high test for land that has been wintering cattle for 12 years. Our drainage all goes to the Tokanui river. It would be interesting to know if there is any discernible difference in Nitrogen or any other levels as a result of our farming practices. |

| Proposed Land and Water Plan Overall | ☐Support ☐Oppose ☐Amend |
| Proposed Land and Water Plan Overall | Reasons: |
| Proposed Land and Water Plan Overall | I see the proposal as being realistic in view of the current water quality issues and requirements of the National Policy Statements. However as stated above the consenting process shouldn't be too complex and expensive for farmers carrying out normal farming practices. |

Consents for Peat Wetlands to be discretionary but with more mitigation requirements than on more favourable soils.
I am submitting on the Proposed Environment Southland Land and Water Plan in relation to the farming related aspects of the Proposed Plan.

I see the proposals overall as being realistic in view of the current water quality issues and requirements of the National Policy Statements.

I have the following comments:

Rule 13v

I support the requirement to map new and existing drains as valuable information for both ES and farmers. I suggest ES make a standard map available to farmers to enter information onto so a consistent quality would be available including date of installation, size and type of drainage.

Rule 20-25

The aspect of these rules that concern me is not so much the requirement for resource consent in some situations but that the consent process is straight forward simple and not expensive for farmers. It needs to be well explained so farmers can avoid the expense of having to engage consultants.

Rule 25a (ii)

I find this confusing. Does this apply to land that is more say 50 or more metres from a waterway but has a tile drain at the base. Is the average of twenty metres in relation to the 20 degree slope a vertical or horizontal 20 metres or both?

Peat Wetlands

Approximately half of our 174 hectare farm at Otara currently grazing and wintering cattle is shown as Peat Wetland on Map 26? That area of the farm also has sand through a lot of that peat area. Can we have this part of the farm independently analysed and different criteria attached depending on the results found. Non complying is a high test for land that has been wintering cattle for at least the past twelve years. Our drainage all goes to the Tokanui River. It would be interesting to know if there is any discernible difference in Nitrogen or any other levels in the river as a result of our farming practices.

I believe it should be discretionary but with more requirements than on the more favourable soils.

Paul Duffy.