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: Emma McLeod
Organisation*: __________________________________________
* the organisation that this submission is made on behalf of
Postal Address: 1394 Pyramid Waiparu Road, RD7, Gore, 9777
Email: __________________________________________
Contact name and postal address for service of person making submission (if different from above):

Phone (Hm): ______________
Phone (Wk): ______________
Phone (Cell): ______________
Postcode: ______________
Fax: ______________

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: ___________________________ Date: 29/7/16

(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
<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><strong>EXAMPLE</strong> Appendix G</td>
<td>EXAMPLE: ☐ Support ☐ Oppose ☑ Amend Reasons:</td>
<td><strong>EXAMPLE</strong> Popular bathing sites should include Makarewa River at Waiaceton.</td>
</tr>
<tr>
<td><strong>Policy 9 - Old Matuara</strong></td>
<td>☐ Support ☐ Oppose ☐ Amend Reasons: I oppose in part the wording used &quot;strongly discourage&quot; which will not support the granting of consents in light of technological or scientific advances through the life time of the proposed plan, that could significantly change our understanding and/or impact of common dairy farming practices/intensive winter grazing on water quality as we currently understand it. It also weighs heavily in favour of the environment over sustainable, profitable food production and economic growth of the Southland region.</td>
<td>Remove point 3 from policy 9</td>
</tr>
<tr>
<td><strong>Policy 16 - Farming activities that affect water quality</strong></td>
<td>☐ Support ☐ Oppose ☐ Amend Reasons: I oppose in part the wording used &quot;strongly discourage&quot; for the same reasons as mentioned for Policy 9 above. This policy uses wording &quot;close proximity&quot; which is unclear as to how this would be consistently interpreted across the region and applied on farm.</td>
<td>Reword policy 1b Provide a definition for &quot;close proximity&quot; in terms of standard measurement units.</td>
</tr>
</tbody>
</table>
| Rule 23 - Intensive winter grazing | | 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 23 continued | □ Support □ Oppose □ Amend Reasons: The time frame of 30th May 2018 is practically unreasonable given the unknown requirements for the consent. Crops for 2018 winter need to be sown and established by November 2017. There are concerns ES will not have the provisions in place to manage the additional workload which will have a flow on effect of poor crop yields, affecting animal welfare and inadvertently shifting the nutrient loss from one area to another if stock have to be wintered elsewhere. Ultimately this isn't addressing the issue of water quality. Request the time frame is extended to 2020 to allow more time to construct a practical framework to manage the effects of intensive winter grazing. | Reinstall using a percentage of the farmed area to provide for the winter feeding of stock. |
| Rule 23, 23bvii Rule 25 | □ Support □ Oppose □ Amend Reasons: I oppose in part the use of blanket rules for the area allowed to be intensively winter grazed across all physiographic zones irrespective of farm size, stocking rate, winter feed requirements of stock and current practices carried out at an individual farm level. This also disregards crop yield and stocking rate on the proposed areas which could inadvertently increase the loss of nutrients through the winter period due to the effects of nutrient concentration, which would not achieve the objective of maintaining or improving water quality. Provide a definition with reference to the parameters that deem a body of water to be a lake. Provide definitions for "intensive winter grazing" and "forage crop" |

Add further pages as required – please initial any additional pages.
| Rule 25 - Cultivation on sloping ground | Amend: There is uncertainty around the application of the ruling of the slope of an area to be cultivated. | Provide ruling on whether the slope is determined by the average slope of an area to be cultivated or whether the rules apply to each area of a paddock with varying slopes included. |
| Rule 22e - New or expanded dairy farming of cows | Amend: There is uncertainty around the management of more than one physiographic zone in a property, whether it is new or existing. Farmers would benefit from clarification around the wording used in 22e, whether it means every rule pertaining to a specific physiographic type present on a farm is applicable to the entire land holding or whether they only apply to their corresponding physiographic zones on the farm. The latter would encourage farming practices to be tailored as per the physiographic zone they were being undertaken on at a farm level. | ES to rule where more than one physiographic zone is present on farm, then each area is to be treated by the applicable rules, but not accumulatively to the whole land holding. |
| Water and Land Plan | Amend: There are no provisions within the plan that determines the roles and responsibilities of a lessor and lessee. Who would be responsible for creating and implementing the Farm Management Plans, and in the instances of a breach of consent or plan rules, who is liable. Leasing is a common option for many farmers. | ES to provide clarification or ruling on the roles and responsibilities of a lessee and lessor. |
| | Amend: There is very little quantitative data available on the economic impact the proposed plan will have on the Southland economy in both the plan and Section 32 report. Whilst in general farmers are in support of maintaining and improving water quality, the tone of the plan is heavily weighted in favour of the environment and gives little acknowledgement and quantitative data on the cumulative effects of implementing the plan at a regional, and community level. The outcomes could impact small rural towns, schools and unemployment rates throughout our community. I don't feel these affects have been acknowledged or accounted for. | ES to complete and release a quantitative Economic Impact Report before the proposed plan is implemented. |