To: Southland Water and Land Plan  
Environment Southland  
Private Bag 90116  
Invercargill 9840

From: Upper Aparima Catchment Group
Feedback on: Proposed Southland Water and Land Plan

Background:

The following submissions are from the Upper Aparima Catchment group. This group is made up of landowners and stakeholders in the Aparima catchment from the Wreys Bush Bridge at the southern end to the headwaters and tributaries at the northern end of the catchment. Many of the members have lived in the catchment all their lives.

Trade competition:

We could not gain an advantage in trade competition through this submission.

Hearings:

We wish to be heard in support of our submission; and we would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.
**Submission:**

Our submission is recorded in the following table.

<table>
<thead>
<tr>
<th>Page #</th>
<th>Policy # or rule #</th>
<th>Name of policy or rule</th>
<th>Support / oppose</th>
<th>Reason</th>
<th>Recommended alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td>18</td>
<td></td>
<td>Physiographic Zones</td>
<td>Support</td>
<td>We support the use of physiographic zones for the classification of land types.</td>
<td>We would like provision to define more accurately the boundaries of these particular zones on individual farms.</td>
</tr>
<tr>
<td>52</td>
<td>Rule 23</td>
<td>Intensive Winter Grazing</td>
<td>Oppose</td>
<td>We don’t believe that giving an arbitrary number on area will have any positive impact on water quality.</td>
<td>We are supportive of the Management Plans in accordance with appendix N and that these are submitted to council or the land sustainability team for approval in lieu of consent. As a result we would only see a consent to be necessary in rare cases.</td>
</tr>
<tr>
<td>54</td>
<td>25</td>
<td>Cultivation on Sloping ground</td>
<td>Oppose</td>
<td>We believe the slope vs buffer numbers are not simple to remember in the field. We believe 20 deg is not steep enough. Confusion over “outer edge of bed.” Spraying such as “spray and pray” or broadcast spraying and oversowing should not be classed as cultivation as there is much less runoff risk.</td>
<td>We would recommend a buffer of 1 metre per degree with a minimum of a 3 metre buffer. We think 25 degrees would be more suitable and would give better opportunity to contain weeds. Clarification of “outer edge of bed” Remove spraying from cultivation rule.</td>
</tr>
<tr>
<td>60</td>
<td>35</td>
<td>Discharge of Agricultural Effluent to land</td>
<td>Oppose</td>
<td>Re: one fed lot or feed pad per landholding. We think this is too restrictive on larger land holdings. Rule 35 b iii Change the need for a chartered professional engineer as these are unnecessary.</td>
<td>We think more may be permitted without consent with an appropriate Management plan. (appendix N) Change wording to “a suitably qualified person”</td>
</tr>
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<tr>
<td>94</td>
<td></td>
<td>Stock Exclusion</td>
<td>Clarification</td>
<td>No definition of “waterway” in plan</td>
<td>We think the adoption of Fonterra’s definition would be sensible. 1 metre wide 30cm deep runs 6 months of the year. Could add gravel bed to description.</td>
</tr>
<tr>
<td>50</td>
<td>22</td>
<td>New or expanded dairy farming</td>
<td>Oppose</td>
<td>No clarity for land owner’s potentially severe financial impacts.</td>
<td>Change activity status from discretionary to restricted to give some assurance and clarity over dairy farming rules to be applied.</td>
</tr>
<tr>
<td>198-202</td>
<td>Appendix N</td>
<td>Management Plan requirements</td>
<td>Support</td>
<td>We support in principle the management plans except where stated previously.</td>
<td>We would like the information within these plans to be submitted to council to reduce the need for consents where farms are operating in accordance with best practice.</td>
</tr>
<tr>
<td>All</td>
<td></td>
<td>Southland Water and Land Plan Part A</td>
<td>Support</td>
<td>We generally support in principle the Water and Land Plan except where previously stated.</td>
<td></td>
</tr>
<tr>
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<td></td>
<td>Economic impact</td>
<td>Oppose</td>
<td>Some rules within this plan may have severe financial impact on parts of the community.</td>
<td>We would like to see a full economic impact report and this to be accepted by the community prior to this plan taking effect</td>
</tr>
</tbody>
</table>

Signature: [Handwritten signature]
Date: 25-7-16

Chairman: [Handwritten signature]
Other Members Attached: [Handwritten note]
Upper Apauma Catchment Group
Present at submission meeting

Paul Turner 1855 Wapsi Bush 0273055845

Cicero McGregory Wapsi Bush 0274360384

Frank Metzler Ryan Farms 0274313933

Andrew Pearz Etokele 03 2257271

Pete Turner Mossburn 027 220127

Philip van der Bijl 2361 Wapsi Bush-Mossburn Road 0272941801

Tony Miles 1083 Wapsi Bush Mossburn Road 027733166

Patrick Oosteep 147 Wapsi Bush Kightleys Hwy 027467674

Marcel van Rooijen 902 Avondale Road 0272276186

Michael Beattie 66 Endowment Rd 0272744680

Howard Boog 15 Dunedin Valley Rd 0272848399

Michael Blomfield 14 Heenan Rd Opio 0272257442

Frank van Mittenburg 60 Sinclair Rd Rotorua 0272219621

Absent via apology:

Russell Drummond Avondale

Nathan Hamilton

William Egan Wapsi Bush

Piet van Mittenburg Opio

Reese Dalkeaven

Badly Stewart Wapsi Bush

Kerry Curtin