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: Mark Townshend

Organisation*: Waikoaka Holdings Limited
* the organisation that this submission is made on behalf of

Postal Address: C/- Townshend Office
4938 Orchard East Road, RD 1, Ngatea

Email: townsmgde@xtra.co.nz

Phone (Hm):

Phone (Wk):

Phone (Cell):

Postcode: 3597

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: __________________________ Date: 29/7/2016

(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 are:</th>
<th>My submission is that:</th>
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<tbody>
<tr>
<td>EXAMPLE Appendix G</td>
<td>☐ Support ☐ Oppose ☑ Amend</td>
</tr>
<tr>
<td>Southland Water &amp; Land Plan (general)</td>
<td>☐ Support ☐ Oppose ☑ Amend</td>
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</table>

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.)

- Popular bathing sites should include Makarewa River at Wallacetown.
- We suggest that the principles and objectives of the plan be amended to provide parity for social, cultural and economic well-being as has been outlined for water quantity and quality.

Thank you for the opportunity to participate in the Environment Southland Land & Water Plan submission process. We are supportive of a region-wide approach to protecting and improving the well-being of Southland, including its land and water resources. However, we feel that the approach of this plan does not adequately balance the community as a whole in terms of the social, cultural and economic impact of achieving water quality/quantity ideals within set timeframes. We feel that there is too great an emphasis placed on water quality and quantity at the expense of social, cultural and economic well-being. Further, we believe that an unfair emphasis has been placed on agriculture (and especially dairy farming) with limited acknowledgement of urban and industrial impacts on the environment, such as wastewater and industrial discharge.
<table>
<thead>
<tr>
<th>Southland Water &amp; Land Plan (general)</th>
<th>☐ Support ☑ Oppose ☐ Amend</th>
<th>We believe that all changes from the status quo should be aligned with the timeframes outlined in Rule 20, i.e. 30 May 2018.</th>
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<tbody>
<tr>
<td><strong>Reasons:</strong></td>
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<tr>
<td>The plan states that &quot;Pursuant to Section 868(1)(a) and (3) of the Resource Management Act 1991 all of the rules in the Proposed Southland Water and Land Plan take immediate legal effect from the date of notification.&quot; Given that there are material changes as to what is a permitted, discretionary and non-complying activity (such as that stipulated for cultivation), we believe that this is not a reasonable approach.</td>
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<td>(Specify provision number and title, e.g. Policy 17 – Effluent management)</td>
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<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>
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<tr>
<th>Region-wide Objectives: Objective 6 &amp; 11 (page 22-23)</th>
<th>☐ Support ☐ Oppose ☑ Amend</th>
<th>We suggest that these objectives are further defined in a completely objective manner. For example, outlining what constitutes a genuine improvement in the quality of water be incorporated as a measurable (or measurables). This would enable both historic and present day levels of water quality to be assessed to evaluate performance. Timeframes for any measurables should be set such that they are genuinely achievable for industry.</th>
</tr>
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<td><strong>Reasons:</strong></td>
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<td>We believe that in order to measure improvement (and ensure accountability) that the objectives listed in pages 22-24 of the draft plan should be more quantitative in nature. For example, Objective 6 refers to 'no reduction', 'maintaining' and 'improving' water quality. In it's present form, it is not clear as to what constitutes a positive or negative shift in water quality. Similarly, Objective 11 refers to water 'efficiency' with no quantified basis as to what is deemed as an efficient allocation.</td>
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<tr>
<th>Rule 20(e)(i) &amp; Appendix N</th>
<th>☐ Support ☐ Oppose ☑ Amend</th>
<th>We suggest that this section of the plan be amended to provide more clarity on requirements, monitoring and accountability of Management Plans - and how this will be pushed out to other industries (i.e.not just dairy farming) in the future.</th>
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<td><strong>Reasons:</strong></td>
<td></td>
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<tr>
<td>We support, in principle, the introduction of Management Plans however feel that there is much greater clarity required in terms of how this will be monitored and who is accountable (for example, in the...</td>
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</tbody>
</table>
| Rule 21 - Existing dairy farming of cows (page 50) | ☐ Support ☐ Oppose ☑ Amend | Reasons:  
We believe that an arbitrary date for measuring livestock numbers of 30 May 2016 is too simplistic to deliver an equitable solution to the existing dairy industry as this single point in time may not reflect 'normal' historical practise or genuinely sustainable stocking rates. Further, a simple number of cows does not reflect the fact that there is a material difference in animal liveweight. For example, the current range between breeds is as much 370 and 600 liveweight for Jerseys and Holstein-Friesians respectively (based upon DairyNZ information) and therefore will have a materially different per cow impact on the environment. Different system types (i.e. low input system 1 vs. high input system 5) will also have a varying impact on the environment. | We suggest that it be possible to evidence livestock numbers at any date prior to 30 May 2016 as to ensure that one-off lulls in animal numbers (such as might be the case during a farm ownership transition) are accommodated for a permitted activity. Further, we suggest that definition of stocking rate be improved from a simple 'cows per hectare' to a 'liveweight per hectare' measure. |

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

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

| Rule 23- Intensive Winter Grazing (page 52) | ☐ Support ☑ Oppose ☐ Amend | Reasons:  
We believe that this rule is not necessary due to the controls that are introduced for dairy farming activity. That is, by imposing restrictions on dairy farm operations this will, by default, control the demand for intensive winter grazing. If this rule was to remain, we believe that it |

We suggest that this Rule is removed from the draft plan.
should at least be amended from an arbitrary maximum number of hectares (as this promotes a 'luck of the draw' situation where multiple, small title holders will benefit and single, large title holders will be disadvantaged) to a mechanism that relates to the grazing requirements of a typical Southland dairy operation. Perhaps more importantly, a simple nominal hectare limit is likely to have the consequence of moving the industry towards higher yielding crops (in order to meet feed requirements within a set area) and therefore drive more intensive winter grazing programmes.

<table>
<thead>
<tr>
<th>Rule 25 - Cultivation on sloping ground</th>
<th>☐ Support  ☐ Oppose  ☑ Amend</th>
<th>We suggest that Rule 25(a)(ii) be amended to remove the reference to cultivation on land greater than 20 degrees in slope not constituting a permitted activity.</th>
</tr>
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<tr>
<td>Reasons:</td>
<td></td>
<td>We appreciate the concept that steeper slopes that are close to waterways have a greater impact on potential run-off: however we believe that the proposed rule is too restrictive in that all slopes over 20 degrees are not to be cultivated - particularly where these slopes are not necessarily within the proximity of a waterway.</td>
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<th>Rule 38 - Animal and vegetative waster</th>
<th>☐ Support  ☐ Oppose  ☑ Amend</th>
<th>We suggest that (d)(iv) be removed from Rule 38; or at the very least replaced with tangible parameters to assess soil conditions.</th>
</tr>
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<tbody>
<tr>
<td>Reasons:</td>
<td></td>
<td>We believe that it is fair to have controls around when animal waste can and can not be applied. However, we believe that have an arbitrary window of time where this can not occur is too simple, and whether or not it is suitable or unsuitable to apply animal waster depends on many factors such as rainfall, soil moisture and soil temperature for example.</td>
</tr>
</tbody>
</table>

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

Rule 59 - Culverts and ☐ Support  ☐ Oppose  ☑ Amend

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.)

We suggest that Environment Southland
| Sediment Traps (page 81) | Reasons:  
We believe that the section titled “Environment Southland will exercise control over the following matters:” be removed from Rule 59 - with particular reference to require a culvert design to be approved by Environment Southland. | publishes a set of acceptable designs that culverts must meet in order to be a permitted activity. These designs would form part of the criteria in Rule 59(a) as a permitted activity. |
|----------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Rule 23 - Intensive Winter Grazing (vii) | ☐ Support ☐ Oppose ☑ Amend  
Reasons:  
We believe that the buffer zones outlined in Rule 23 (vii) (1-3) are excessive when considered in relation to the slope categorisation. | We suggest that either the buffers widths be reduced to Sm is sufficient for slopes greater than 16 degrees; and the buffer widths be reduced proportionately for slopes less than 16 degrees. |
| Glossary - definition of Landholding | ☐ Support ☑ Oppose ☐ Amend  
Reasons:  
We believe that the proposed definition of landholding is not fit for purpose. The plan stipulates that two or more adjoining certificates of title with a common occupier constitutes a single landholding. It may be that a land owner has adjoining properties that are operated in complete isolation of one another and would potentially be disadvantaged by the proposed definition. | We suggest that (a)(ii) be removed from the definition of Landholding in the glossary. |