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: Bronwyn Jane Chamberlain
Organisation*: West Range Farms Ltd
* the organisation that this submission is made on behalf of
Postal Address: 548 Otahu Eastern Bush Rd
R D 2, Otatau 9682
Email: westrange.stn@farmside.co.nz

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: 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
| 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.) |
|---|---|---|
| **EXAMPLE** Appendix G | **EXAMPLE**  
[Box] Support □ Oppose □ Amend  
Reasons:  
Popular bathing sites should include Makarewa River at Wallacetown. | **EXAMPLE**  
Would prefer some sort of provision for science and good farming practice, to more accurately determine what each farm can do. |
| Physiographic Zones (page 18) | [Box] Support □ Oppose □ Amend  
Reasons:  
I agree in principle, but feel the boundaries on the map may not reflect what the soil type really is. This may de-value some farms or prohibit them from doing certain activities. | We are supportive of having a management plan in place in ensure water quality is protected but feel that good farm practice would go a long way to doing this. I believe a consent should only be necessary in rare cases. I suggest that 25% of the land holding should be eligible for winter cropping. Anymore than this requiring consent. |
| Rule 23 Intensive Winter Grazing (page 52) | [Box] Support □ Oppose □ Amend  
Reasons:  
I don't believe putting a number on the amount of area put into winter crop would have any positive effect on water quality. Would also have a major financial effect on larger land owners having to apply for consents each year and would ES have the staff to process those consents? |  |
<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>Rule 22 New or expanded dairy farming of cows (page 50)</td>
<td></td>
<td>Change activity from discretionary to restricted, to give some assurance and clarity over rules to be applied.</td>
</tr>
<tr>
<td>Appendix N Management Plan requirements (page 198-202)</td>
<td></td>
<td>If farmers were to have their management plans in place for their farm, to show they were taking all steps to look after their land and water. If this was being done, then there would be no need for any consents.</td>
</tr>
<tr>
<td>Southland Water and Land Plan Part A</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>☐ Support ☑ Oppose ☐ Amend</td>
<td>Reasons: No real clarity. This could have major financial impacts on land values.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ Support ☑ Oppose ☐ Amend</td>
<td>Reasons: I agree in principle with the management plan except where I have previously stated.</td>
</tr>
<tr>
<td></td>
<td>☐ Support ☑ Oppose ☐ Amend</td>
<td>Reasons: I support in principle, what ES are trying to do except where previously stated.</td>
</tr>
</tbody>
</table>

Add further pages as required – please initial any additional pages.
Continue on additional pages if necessary. You are not limited to the spaces provided.

<table>
<thead>
<tr>
<th>The specific provisions my submission relates to are:</th>
<th>My submission is that:</th>
<th>The decision I would like Environment Southland to make is:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Specify provision number and title, e.g. Policy 17 – Effluent management)</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>
</tbody>
</table>

**EXAMPLE**

Appendix G

- Support [ ] Oppose [ ] Amend
- Reasons:

**EXAMPLE**

Popular bathing sites should include Makarewa River at Wallacetown.

<table>
<thead>
<tr>
<th>Economic Impact</th>
<th>A full economic impact report needs to be done and accepted by the community before this plan takes effect.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rule 25 Cultivation on Sloping ground (page 54)</td>
<td></td>
</tr>
</tbody>
</table>

- Support [ ] Oppose [ ] Amend
- Reasons:
  - Some rules in this plan will have some severe financial impact on parts of the community
  - This rule is far too confusing. Would be very hard to achieve out in the field, trying to work out slope and the outer edge of a waterbed.
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: Derek John Chamberlain
Organisation*: Westrange Farms Limited
* the organisation that this submission is made on behalf of
Postal Address: 548 Otahu Eastern Bush Road  R.D.2 Otautau 9682
Email: westrange.stn@farmside.co.nz

You can also deliver your submission to Environment Southland's North Road office or fax it on 03 211 5252.

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: [Signature]
Date: 28/7/16

(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
| 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 35  
Discharge of Agricultural Effluent to Land  
(page 60) | □ Support  □ Oppose  □ Amend  
Reasons:  
This again disadvantages the larger land owner. Given the restrictions on winter grazing, feed pads may become a way of the future. | I believe this should be a permitted activity without a consent, provided a good management plan is in place. The number of animals should not be an issue. |
| □ Support  □ Oppose  □ Amend  
Reasons: | | |
| □ Support  □ Oppose  □ Amend  
Reasons: | | |

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)

<table>
<thead>
<tr>
<th>The specific provisions my submission relates to are:</th>
<th>My submission is that:</th>
<th>The decision I would like Environment Southland to make is:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Specify provision number and title, e.g. Policy 17 – Effluent management)</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>
</tbody>
</table>

<table>
<thead>
<tr>
<th>EXAMPLE Appendix G</th>
<th>EXAMPLE</th>
<th>EXAMPLE</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Support □ Oppose □ Amend</td>
<td>Reasons:</td>
<td>Popular bathing sites should include Makarewa River at Wallacetown.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Economic Impact</th>
<th></th>
<th>A full economic impact report needs to be done and accepted by the community before this plan takes effect.</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Support □ Oppose □ Amend</td>
<td>Reasons:</td>
<td>Reasons: Some rules in this plan will have some severe financial impact on parts of the community</td>
</tr>
<tr>
<td>Reasons:</td>
<td>Some rules in this plan will have some severe financial impact on parts of the community</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Rule 25 Cultivation on Sloping ground (page 54)</th>
<th></th>
<th>I would prefer to see a simple rule where all possible care should be taken to protect water quality. Spraying should be excluded from the cultivation rule.</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Support □ Oppose □ Amend</td>
<td>Reasons:</td>
<td>Reasons: This rule is far too confusing. Would be very hard to achieve out in the field, trying to work out slope and the outer edge of a water bed.</td>
</tr>
<tr>
<td>Reasons:</td>
<td>This rule is far too confusing. Would be very hard to achieve out in the field, trying to work out slope and the outer edge of a water bed.</td>
<td></td>
</tr>
</tbody>
</table>

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 – Efluent 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 22  
New or expanded dairy farming of cows  
(page 50)  
Appendix N  
Management Plan requirements  
(page 198-202)  
Southland Water and Land Plan Part A | □ Support  □ Oppose  □ Amend  
Reasons:  
No real clarity. This could have major financial impacts on land values. | Change activity from discretionary to restricted, to give some assurance and clarity over rules to be applied.  
If farmers were to have their management plans in place for their farm, to show they were taking all steps to look after their land and water. If this was being done, then there would be no need for any consents. |
| □ Support  □ Oppose  □ Amend  
Reasons:  
I agree in principle with the management plan except where I have previously stated. |
| □ Support  □ Oppose  □ Amend  
Reasons:  
I support in principle, what ES are trying to do except where previously stated. |

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)

<table>
<thead>
<tr>
<th>My submission is that:</th>
</tr>
</thead>
<tbody>
<tr>
<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>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>The decision I would like Environment Southland to make is:</th>
</tr>
</thead>
<tbody>
<tr>
<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>
</tbody>
</table>

**EXAMPLE**

**Appendix G**

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

**Reasons:**

**EXAMPLE**

Popular bathing sites should include Makarewa River at Wallacetown.

**Physiographic Zones**

(page 18)

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

**Reasons:**

I agree in principle, but feel the boundaries on the map may not reflect what the soil type really is. This may de-value some farms or prohibit them from doing certain activities.

**Rule 23**

Intensive Winter Grazing (page 52)

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

**Reasons:**

I don't believe putting a number on the amount of area put into winter crop would have any positive effect on water quality. Would also have a major financial effect on larger land owners having to apply for consents each year and would ES have the staff to process those consents?

**We are supportive of having a management plan in place to ensure water quality is protected but feel that good farm practice would go a long way to doing this. I believe a consent should only be necessary in rare cases. I suggest that 25% of the land holding should be eligible for winter cropping. Anymore than this requiring consent.**