

Our recommendations on the Plan include:

Physiographic zones – *Our recommendation is that any reference to physiographics is removed from the Plan.* The physiographic zones have not been ground-truthed and there is no mechanism for landowners to review the zone/s their land has been placed in. It is unnecessary and premature to make some activities 'non-complying' based on this risk-based model.

Intensive winter grazing – *Our recommendation is that intensive winter grazing remains a permitted activity, subject to good management practices and some practical set-backs from waterways;* The area restrictions placed on intensive winter grazing do not recognise the practical need to feed livestock all year round, and in Southland stock cannot be grazed extensively over the winter months.

Stock exclusion from waterways – *Our recommendation is that the requirements do not apply to farms where the average stocking rate is 5 stock units per hectare or less, or where stock need to access waterways for drinking water;* The exemption for sheep is appropriate, but overall the stock exclusion requirements are unworkable and not practically or economically feasible for extensive farming operations in Southland, or where stock rely on drinking water from waterways.

Cultivation – *Our recommendation for setbacks for cultivation is: 3 metres from the outer edge of the bed on land with a slope of less than 8 degrees; and then 1 metre incremental increases on slopes above 8 degrees. We also recommended increasing the 20 degree permitted activity limit for cultivation up to 25 degrees;* Federated Farmers supports set-backs from waterways for cultivation to reduce sedimentation, but disagrees with the extent of those proposed in the Plan.

New or extended dairy farming – *Our recommendation is to change the discretionary and non-complying activity statuses to 'restricted discretionary' so that the resource consent process is transparent and more efficient;* The non-complying activity statuses for new or extended dairy farming in the Old Mataura and Peat Wetlands physiographic zones are inappropriate. Currently there is not enough known about nutrient loading and whether there are over-allocated catchments within Southland.

Submitter No: 280

Submitter Name: Forward Holdings

Date Received: 13/9 /17