

We farm a 3400ha property in the Te Anau Basin, where we are currently undertaking a consented development program, which will increase our stock carrying capacity over the next 5 years. This will leave 48% of the property protected under QE11 covenants once completed. The development project has been undertaken with advice from all key stakeholders including ES, SDC, Fish & Game, Waiau Trust, QE11, Iwi etc. Continuing advice is received from ES staff and Waiau Trust regarding the best measures to protect our waterways. Our project has been described as a "model" for future development.

With this in mind we wish to raise the following brief points to show how some of the proposed water & land plan rules do not cater for larger scale properties in a sensible fashion.

1. Rule 23 – Intensive winter grazing – if more than 50ha & higher than last 3 years average, then we ask that you consider a percentage basis as a second measure, ie 15% . This would provide a better tool for larger scale properties and reduce the need for unnecessary consent applications.
2. Rule 49 – Abstraction of surface water – max 86,000l, need enough for stock drinking requirements. This rule does not cater for larger scale properties who are already using more than this.
3. Rule 52 – Water abstraction from Waiau catchment – We support the recommendation 8.294 giving the ability to access ground water for irrigation if a low connectivity is proven between the ground & surface water. I refer to Brian Ellwood's report in support of Meridian' submission, which shows an extreme version of the whole Waiau catchment being irrigated and converted to dairy & support farming. I would like to submit that this will not be the case as it will be severely moderated by land contour and more importantly the future N limit setting process.
4. Objective 6 – Maintain water quality – keep the nitrate mania in context. Establish a level that is sensible, *assuming 'BMP' for N, P & E Coli*  
*or okay for stream life, invertebrates, fish etc.*

Submitter No: 156.

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